

Chapter VII

Public Comments and Responses

In this chapter:

- **Public Involvement Draft EIS Comment Period**
- **Comments on the DEIS and Responses**
- **Copies of All Letters, E-mails, and Comments Received**

Public Involvement Draft EIS Comment Period

In early August 1999, we made three separate mailings regarding the Draft EIS to about 1500 interested or affected governments, agencies, organizations, and individuals.

- One mailing included the Draft EIS, a cover letter, and comment form.
- Another went to people who had requested the Draft EIS Summary.
- A third mailing told people the Draft EIS was available and how to receive a copy.

Bonneville, the BLM, and a Forest Service Region posted the Draft EIS and comment links on their respective Web sites.

A news release was sent to media throughout the Northwest announcing availability of the Draft EIS and telling how to request a copy.

Notice was also published in the monthly *BPA Journal* that is mailed to customers and others interested in the agency's work.

An open-house style public meeting was held Wednesday, September 15, 1999, in the State Office Building in Portland, Oregon.

Opportunities

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Bonneville's Constituent Account Executives contacted governmental agencies and public interest groups to invite them to the public meeting and to offer opportunities for one-on-one discussions on the Draft EIS.

A "Crossing Paths" publication was developed specifically for the Tribes of the Northwest to encourage discussion and comment. Tribes with Bonneville facilities on their lands and/or those who expressed interest or comments during scoping were contacted and offered opportunities for one-on-one meetings to provide comments on the Draft EIS. Bonneville staff also attended the Affiliated Tribes' September 27 meeting in Pocatello, Idaho, to tell people about the Draft EIS and to solicit comment.

The comment period officially closed October 9, 1999, but we continued to accept comments (through early January 2000) from Tribes and persons informing us that their comment would be late.

Comment Summary

We catalogued a total of 271 comments. Most were submitted in writing, by letter, e-mail, or on the comment solicitation form that was mailed with the Draft EIS. The meetings generated few comments, as did the phone calls.

Every part of the Draft EIS attracted comment, but three chapters (III, IV, and VI) drew 75 percent of the comments. Those commenting on Chapter III, Site-specific Planning Steps, most often focused on noxious weeds and land use and landowner issues. Comments on Chapter IV, Program Alternatives, targeted right-of-way management and right-of-way methods. Chapter VI, Environmental Consequences, most often attracted comments about potential herbicide impacts on water, fish and aquatic species, and wildlife.

Who commented? Just over half of the 39 people submitting comments in writing (only written comments can be accurately traced) were affiliated with governmental agencies: Federal (35 percent); local, mainly weed control boards (11 percent), and state (5 percent). Individuals submitted 16 percent of the written comments and Tribal agencies submitted 14 percent. The remainder were submitted by interest groups, utilities, and academic institutions.

How to Use This Chapter

Comments are organized by chapter. At the end of each comment is an identifying number that refers to the number of the response (in the order in which the letter, email, phone message, or meeting comments were received). The letters, e-mails, phone call logs, or meeting summaries that contain comments are copied in whole at the end of this chapter.

Comments and Responses to *Purpose & Need* (Chapter I)

Comment: . . . *the draft EIS on vegetation management . . . incorporates the concepts of integrated vegetation management, making use of a variety of approaches to achieve the vegetation management goals of your program. In my opinion, it takes a balanced and scientifically sound approach to the issues involved.* [#19]

General

Response: Thank you for your review and comment.

Comment: *Noxious weed management ought to have been promoted as a "purpose" (page S-1) given the impact (existing and potential) that transmission system vegetation management has on plant communities and adjacent lands, as regards noxious weeds. Perhaps earnest noxious weed management is implied in the third purpose: "comply with laws and regulations"? [#7]*

Purposes

Response: Noxious weed management should have been part of our "need" for vegetation control. We have added it. Thank you.

Comment: *Chapter I - PURPOSE AND NEED Page 3: Reasons for the EIS: Your document states that: "Preparation of this document is intended to fulfill the requirements of the National*

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Environmental Policy Act (NEPA) for Bonneville". What does this mean? What specific NEPA requirements is this EIS intending to fulfill (if any)? The Forest Service does not believe that this programmatic analysis is adequate to account for the environmental effects of site specific vegetative management activities along every mile of Bonneville's transmission facilities on National Forest System lands. Statements like that quoted above have the potential of implying otherwise. This statement should be clarified to more appropriately state something to the effect that: "This document discloses the estimated environmental effects of a variety of vegetative management methods that may be considered and applied at Bonneville facilities. Decisions for treatment methods will be made in accordance with existing and/or future site-specific vegetative management plans". [#39]

Response: We have clarified the statement to indicate that this EIS is fulfilling the requirements of the National Environmental Policy Act (NEPA) *for the decisions that are being made through this process.* Through this process, Bonneville is making decisions *regarding what methods should be in our toolbox* for managing vegetation throughout our system. We are also proposing *planning steps and mitigation commitments* for site-specific actions. These are federal decisions that could potentially affect the environment and, as such, require us to fulfill the requirements of NEPA and its implementing regulations, as well as other federal laws. This NEPA process is intended to help our agency make decisions on our program that are based on an understanding of the environmental consequences.

We agree that these decisions are *not* site-specific. The planning steps lay out the process for completing site-specific NEPA compliance tiered to this EIS.

Comment: *Page 4: Efficiency and Consistency; Your document states: "Site-specific analysis would be in the form of a Supplemental Analysis". Recommend you add to this statement the following: "Supplemental, site-specific analyses will be documented, and appropriate decision documents written, in accordance with the policies and procedures for the implementation of NEPA of the agency having land management jurisdiction on the affected area, and in accordance with all other applicable State and federal laws and regulations". [#39]*

Response: We have revised the statement to reveal that at times other federal agencies would also have to make decisions regarding Bonneville's site-specific project proposals, and that in those circumstances those agencies' NEPA policies and procedures would also apply. Thank you for bringing this to our attention.

Comment: . . . *the DEIS does not provide sufficient implementation detail, mitigation commitments, or alternative analysis to determine site specific impacts. . . . We would like to be involved in the future review of this program if BPA decides to significantly change the described preferred alternatives or follows through on our recommendation to produce site specific plans for the program in our region.* [#40]

Response: We agree that this document is not an analysis of site-specific impacts. The planning steps are developed to ensure that the appropriate resources are considered at the site-specific level for NEPA compliance and appropriate decisions. The analysis will tier to the EIS for environmental effects of the various methods so that the need to repeatedly (and potentially, inconsistently) cite those effects in individual site-specific plans will be precluded. The site-specific analysis can be consistent, focused, and pertinent to the decisions to be made. (Please note that analysis would be needed for all facilities, as appropriate.)

Comment: *As you have disclosed in this document, the programmatic approach that you are undertaking will serve to identify the environmental effects of various treatment methods. Its primary benefit will be its availability as a source of reference in the development of site specific management plans. In tiering to the environmental effects of various treatment methods, as disclosed and documented in this analysis, the need to repeatedly (and potentially, inconsistently) cite those effects in individual site-specific plans will be precluded.* [#39]

Response: Yes, this EIS is being prepared not only to facilitate good program-wide decisions, but also to provide analysis of vegetation control methods that will be tiered to for site-specific analysis. Also, with planning steps in place, good decisions can be made regarding appropriate methods to be used and NEPA compliance can be consistent, focused, and pertinent to the decisions to be made.

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Public Involvement

Comment: *Formal tribal consultation on a government-to-government basis with potentially affected tribes is required for the federal lands under the administration of the Modoc National Forest. This consultation requires a one on one meeting between the tribes and a decision maker for [Bonneville] in addition to providing opportunities for written comments. The Modoc NF has provided the list of tribal representatives. Please let us know if this consultation has already taken place and the results. [#32]*

Response: Bonneville contacted Northwest Tribes to gain input into our program. Bonneville met with several Tribes for one-on-one meetings as requested, and had phone conversations regarding issues or concerns. None of the Tribes stated a need for formal consultation on this EIS (though some thought there might be a need during the development of site-specific right-of-way management plans or if their issues were not addressed to their expectations). The Tribal representatives listed by the Modoc National Forest were contacted personally by phone. No meetings were requested as a result.

Comment: *I am a Hoh Tribal member from the State of Washington and I am also a cultural teacher. I teach the traditional weaving of the coastal Indian throughout the Pacific Northwest. [At a conference attended by basketweavers and representatives of the BLM, Dept. of Fisheries and Forestry] the weavers were presented with draft administrative rules concerning the gathering sites and permits to gather. I told the parties on the panel that I felt it was a violation of my treaty right to gather where we have always gathered as stated in the treaty. I also stated that I do not believe that tribal council can change my treaty right and any agreement that is signed should have be reviewed by the traditional Indian people. I have been on the tribal 21 years before I resigned to in 1996, so I know all of the administrative rules that the government can present only to the council and not the people. I have reviewed your draft and I was wondering if you have contacted the Tribes that are in the area for any review about the use of herbicides. I think that the statement on the draft is very important and BPA should really take into consideration the Indian people and use of the materials throughout the country. [#12]*

Response: Bonneville actively sought and received Tribal comments on the program. We contacted the Tribes in the Northwest. We

greatly appreciate the time it takes to review and comment on the Draft document and have worked to make changes based on much of the input we received.

Comment: *Thank you for giving us the opportunity to comment. [#22]*

Comment: *Thank you for putting such a nice informational packet together. [#27]*

Comment: *Thank you for letting me comment. [#25]*

Comment: *Thank you for the opportunity to comment . . . [#29]*

Comment: *Really like your meeting layout and graphics. [#30]*

Comment: *Thank you for the chance to review the Transmission System Vegetation Management Program DEIS. [#33]*

Response: You are welcome. Thank you for taking the time to comment.

Comment: *The State Clearinghouse submitted the above named environmental document to selected state agencies for review...and no state agencies submitted comments. . . . This letter acknowledges that you have complied with the State Clearinghouse review requirements. [#37]*

Response: Thank you for acknowledging compliance.

Comment: *The Forest Service sincerely appreciates the BPA's efforts to reach out, solicit the concerns of the Forest Service, and to address those concerns in this programmatic analysis. We believe that most of the Forest Service's concerns, previously provided to the BPA in the course of this analysis, have been adequately disclosed and addressed in this DEIS. [#39]*

Response: Thank you. Bonneville appreciates the work that the Forest Service has put into this effort as a cooperating agency. We hope these efforts will help our agencies work smoothly and effectively together at the site-specific level.

Cooperating Agencies

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Comment: *... the Forest Service has consistently represented to the BPA that a product of this programmatic analysis, and its Final EIS/Record of Decision, will NOT be Forest Service approval for the BPA to begin the implementation of vegetative treatment methods along its rights-of-way on National Forest System lands. We believe that existing, revised, and/or new site-specific vegetative management plans are needed as the basis for vegetative treatment activities on any segment of BPA's authorized use and occupancy on NFS land. Such plans need to be developed and adopted for use in accordance with the provisions of NEPA, and pursuant to the provisions of the outcome of this EIS/ROD. [#39]*

Response: We completely understand that Forest Service cooperation on this EIS is not approval to implement vegetation control without further site-specific work. Your work on this document is to help set in place the planning steps, agreeable to both agencies, for site-specific NEPA compliance, and to help ensure that the environmental effects of various treatment methods have been analyzed adequately to be able to tier to this analysis/cite those effects in individual site-specific plans. We look forward to working with individual Forests on revising or developing site-specific vegetation management plans.

Comment: *... with your adoption of this programmatic plan, there will be a potential opportunity created to more fully realize its benefits with respect to vegetative management activities on NFS lands. That can happen if the BPA is willing to consider a comprehensive revision to the manner in which its facilities on NFS lands are now authorized. Currently, BPA's generation and transmission facilities are authorized on NFS lands under a wide variety of old, and in some cases, obsolete, forms of authorizations. They include unique Land Use Grant Instruments ("LUGI's") (that were created specifically for the BPA), Memorandums of Understanding, and various forms of our more standardized special use permits. There is little to no consistency in the terms and conditions between these different types of authorizations. Some include requirements which suggest that the Forest Service is responsible for the development of vegetative management plans (for review and approval by the BPA); a concept that is totally contrary to our management of special uses. Others have little to no reference to vegetative management activities whatsoever. In such cases, BPA has suggested that vegetative management is part of the all-inclusive concept of authorized*

"maintenance" of the facilities, as provided in the authorization. We recommend that upon the adoption of this programmatic plan, the BPA enter into discussions with the Forest Service to consider the potential of replacing all of these existing Forest Service authorizations with current special use authorizations for its facilities on NFS lands. [Specific topics for discussion are detailed.] . . . We [FS] believe that this approach . . . has the potential to benefit both of our agencies, and provides the opportunity for your agency to realize a significant increase in the value of the programmatic vegetative management plan you are now working towards adopting. [#39]

Response: Bonneville welcomes the opportunity to bring greater uniformity to Bonneville's occupancy agreements covering facilities on National Forest. Bonneville and the Forest Service have been in on-going discussions regarding revising our Agencies' Memorandum of Understanding (MOU) to be workable for all parties involved. Although these discussions are outside the scope of this EIS, when a revised MOU is adopted, we look forward to tiering to this EIS for a more streamlined process that will increase the value of this EIS.

Comment: *Please add to the listing of documents provided the following: Forest Land and Resource Management Plans - [which] provide for the allocation of National Forest System (NFS) lands and resources for a variety of management purposes. . . . Other Forest Service Land or Resource Management Plans [which have] [m]anagement direction, prescriptions, and guidelines . . . such as Wild and Scenic River Management Plan.. . . Although this document lists Forest Land and Resource Management Plans as Guidance Documents in Appendix F, we believe that such Plans are of such importance in guiding management activities on NFS lands, that they should also be listed in this part of the document. [#39]*

Response: Thank you for the suggestions. These documents have been added.

Other Related Documents, Projects

Comments and Responses to *Methods* (Chapter II)

Comment: *I have reviewed the August, 1999 draft. There seems to be adequate unit costs for the various process that tend to lead toward the more cost effective and easier to administer processes. However I*

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feel efficiency which I define as cost divided by time should be the economic evaluation basis. Therefore I suggest the economic evaluation be based on cost per unit per year instead of just cost per unit. Also one should look at the cost to maintain the entire system per year instead of cost per unit. Although this may seem to be similar to cost per unit per year, there are differences. [# 5]

Response: Thank you for your suggestion. The EIS describes the costs of the methods per acre in Chapter II Methods. We agree that these costs alone do not give a picture of efficiency or costs over time, but are baseline information. We did not further break down costs over time for specific methods, because for actual vegetation control we want to use a combination of methods, and pure method costs overtime would not be relevant to the decisions to be made.

In Chapter IV Alternatives, the EIS gives *comparative* costs of implementing an alternative (such as which methods package would cost more or less if implemented) both in the short-term and long-term, in our program. We did not give dollar figures because they would depend on too many factors (how many rights-of-way were treated in a given year, at what stage of low-growing plant communities they were in, and so on).

Manual/ Mechanical

Comment: *When controlling noxious weeds many mechanical and manual methods can be very successful. We support utilizing these methods for primary control and the use of pesticides only in extreme circumstances. [#14]*

Response: Mechanical and manual methods *can* be a tool for noxious weed control in some cases, but in general, when used on their own, they are often ineffective in providing long-term control of noxious weeds.

For example, some mechanical methods (mowing) can be used, when critically timed, in infested grass stands to preclude noxious weed seed maturation and allow the grass to compete and establish. Manual methods have also been effective in areas where only a few weeds are established and hand weeding prevents any further need for treatment, or to prevent the plant from forming a flower and making seed.

However, the reliance on manual and mowing methods can also lead to the *increase* of noxious weed populations, since many of the weeds are perennial and have growth forms that actually increase when manual or mowing methods are used. Some examples include the following:

- When mowed, Diffuse and Spotted knapweed re-grow flowers and seedheads lower to the ground (out of reach of mower blades).
- Rush Skeleton weed and other types of noxious weeds have rhizominous roots that develop new plants where broken roots have been left by hand pulling.
- Canada thistle has large root systems that allow the plant to re-grow after mowing.
- Noxious weeds that have a high potential for seed production (scotch broom, knapweed, gorse) can have seed dispersed and spread by mowing after seed-set.
- After ten years of hand-pulling knapweed on Bonneville rights-of-way on the Mt. Hood National Forest (at a cost of approximately \$10,000 per year), the weed population and areas affected have increased.

In conclusion, manual and mechanical methods can be an effective part of an IVM program when used in combination with other methods. Exclusive use of these methods is usually ineffective in dealing with noxious weeds.

Comment: *Page 28, last paragraph: should troller read roller?*
[#22]

Response: Yes. The correction has been made.

Comment: *The Tribe does not support the introduction of non-native biological control species.* [#14]

Response: Thank you for your perspective. Noxious weeds are introduced plant species from other countries or areas. These plants can invade and flourish because they have no natural enemies. Biological control agents (insects, fungi) are often also non-native (if there were native predators for the noxious weed, that weed wouldn't be a problem). These agents are heavily tested to see what their impact may be on native plant species if released. The agents are not authorized for use unless they pass rigorous tests, including a test to ensure that they will feed only on the target plant species. Many people feel that biological controls are a more natural, holistic way of controlling noxious weeds than the use of herbicides.

Biological

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Comment: *An individual from the Colville Tribe commented that bio-control agents for noxious weeds are not very effective. [#31]*

Response: In some areas, and with some weed species, biological controls have not been very effective. In other areas and weed species, they have been found to successfully control, reduce, and control the spread, but not completely eliminate noxious weed species.

Herbicides

Comment: *Page 35. It may be helpful to add a sentence to the 4th paragraph that explains perhaps only a subset of these herbicides may be available to use on certain lands. The Willamette EA only provides for the use of 2 of these herbicides, glyphosate and/or triclopyr. [#33]*

Comment: *. . . several of the land owners involved in the program, including the US Forest Service, restrict the types of chemical agents that are allowed to be used on their lands. Typically only five herbicides are approved for use on Washington State USFS land. These compounds are 2,4-D, dicamba, glyphosate, picloram, and triclopyr. Coordination between landowners and BPA should take place during the planning steps and prior to herbicide application to ensure the interests of all parties are addressed. [#40]*

Response: Thank you for your comment. Bonneville recognizes that the Forest Service and BLM have certain herbicide compounds approved for use on their lands. The list of herbicides in this EIS would be in our overall program toolbox. During planning for site-specific vegetation control (the planning steps), Bonneville will coordinate with these agencies to determine appropriate herbicides for use. (The compounds you have mentioned—2,4-D, dicamba, glyphosate, picloram, and triclopyr — are all on our approved list also.) This need to coordinate at the site-specific level is in the EIS; however, given your comment, we have reiterated the need to consider the planning steps for appropriate herbicides in Chapter II when the herbicide list is first introduced.

Reseeding/ Replanting

Comment: *Section on Replanting: has replanting been done on the Hanford site? [#22]*

Response: Rights-of-way crossing Hanford require vegetation control only for noxious weeds (there are no tall-growing plants to

interfere with the lines or brush to inhibit access). Bonneville has not done any replanting on the Hanford site.

Comment: *What do you do with the trees you cut? [#30]*

Response: Larger trees that are cut are often kept by the landowner for firewood or timber. If Bonneville owns the land, we may sell the trees for timber. Other times the trees are chipped, lopped and scattered, mulched, or (rarely) piled and burned. We have clarified what is done with cut trees in Debris Disposal, Chapter II.

Debris Disposal

Comment: *Debris should be composted. [#15]*

Response: Usually the debris from right-of-way vegetation control is chopped up and left to decompose naturally on-site.

Comment: *The program allows for the approval of new techniques and new herbicides that are not presently listed by name in the document. We have reservations about the approval process, which allows BPA to determine the environmental impacts of newly registered compounds using EPA risk assessment data without contacting the [USFWS]. . . . new techniques may result in new effects to listed species not previously considered in consultation and therefore may trigger re-initiation of consultation. . . . Threatened and endangered species may have different considerations than risk assessment models assume and may be more sensitive to particular compounds than the organisms tested during the registration process. . . . In our opinion the use of a newly registered herbicide would require BPA to consult with the Service regarding effects to threatened and endangered species. [#40]*

Approving New Techniques

Response: We will contact the US Fish & Wildlife Service (USFWS) through our Supplement Analysis process to ensure that potential impacts of the herbicide are considered in determining whether it is appropriate for use. We have clarified the language for the approval process to include appropriate contacts to be made. We acknowledge that approval may require re-initiation of consultation, depending on the potential impacts on species. Thank you for bringing this to our attention.

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Methods Eliminated from Consideration

Comment: *Biological Control Agents (S-9) - the usefulness of sheep were discounted due primarily to logistics. However, Bonneville could utilize the services of a 3rd party to provide sheep, thereby eliminating logistical problems. The use of sheep should be revisited. [#26]*

Response: The logistics of sheep grazing was only part of the reason that this alternative was eliminated from further consideration. The primary reason is because sheep are not very effective in controlling tall-growing species in the rights-of-way. They tend not to eat readily the plant species we need controlled, especially when the plants are out of reach.

Comments and Responses to *Site-specific Planning Steps* (Chapter III)

General

Comment: *Bonneville should develop guidance for field staff responsible for implementing the program on use of low-impact approaches. [#34]*

Response: The planning steps are the guidance for our vegetation control project managers for lessening impacts. The impact of an approach or method is very dependent on site circumstances. We developed the planning steps to help identify site-specific circumstances and determine appropriate methods and mitigation measures to lessen impacts.

Comment: *Overall we feel the document does a good job of . . . providing a process to accomplish site specific plans that will meet a variety of resource needs on the ground. It appears that the planning steps outlined in the document will ensure that site specific concerns are addressed. [#33]*

Response: Thank you for your comments.

Identify Facility and Vegetation Management Need

Comment: *Under Planning Step 1 (Identify Facility and the Vegetation Management Needs), herbicide mitigation measures are specified only for electric yards. We recommend that the same*

mitigation measures also be specified in this planning step for rights-of-way, non-electric facilities, and noxious weed control throughout the BPA service territory. Specifically, these mitigation measures include rotating herbicide use to prevent resistance, avoiding spray drift, determining if water bodies require monitoring for herbicide contamination, and observing riparian buffer and herbicide-free zones defined on page 62 of the DEIS. [#40]

Response: The mitigation measures listed in this section were intended to reflect issues specific to these facilities, but do not exclude the need to apply all other appropriate measures listed in the remaining six steps. Planning step 4, Determine Vegetation Control Methods, has a comprehensive listing of herbicide mitigation measures to be used, as appropriate. We have made some text changes to help clarify this. Thank you for noting this potential confusion.

Comment: . . . several of the herbicides selected for the program are very persistent in soil. An example of this is isoxaben, which has a soil half life of 5 to 6 months. Since the document states that herbicide application in electric fields may occur as often as once a year, the Department [of Interior] would advise BPA to assess if chemical control is needed every year, and if so, to select compounds that are less persistent reducing the potential for accumulation and residual levels of these chemicals in the soil. [#40]

Response: The most persistent herbicides are used in the substation environment, where pre-emergent herbicidal activity is required to keep weeds and grasses controlled at a maximum basis due to immediate human safety concerns (i.e., electrocution). These concerns require Bonneville to be proactive and use annual application techniques regardless of the presence of plants. To minimize impacts, Bonneville has dropped three herbicides (benefin, pendimethalin, and trifluralin) from further consideration. We are also evaluating geology, water, and soil in determining the best combination of herbicides to be used while protecting offsite resources.

Comment: The Blue River District is currently looking at options to restrict access along the road beneath the powerline with a gate. BPA access would still be provided. [#33]

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Response: Thank you for the information; it has been forwarded to the Natural Resource Specialist in charge of Bonneville vegetation management in your area.

Comment: *Regarding washing vehicles to prevent spread of weeds/seeds. If there is a concern with washing vehicles with power washers (oils, metals) use an air gun to blow off noxious weeds. [#13]*

Comment: *I think consideration should be given to pressure washing all vehicles and equipment that enter your right-of-way especially from other weed infested sites. This should be done with the view of washing radiator and under carriages where weeds and plant fragments hide. [#8]*

Comment: *Page 55. Mitigation measures for noxious weeds. Bullet #5: Washing vehicle clause. How about adding wording about developing sites to wash vehicles in association with land owners/managers as part of site-specific management plans. [#33]*

Response: We plan to wash vehicles, when possible, that have been in weed-infested areas before entering areas of no known infestation. When vehicles are washed, they are taken to an approved wash rack or commercial car wash facility. These facilities have oil-water separator systems so as not to contaminate soils or water bodies. We will also consider implementing the last suggestion on a site-specific basis with large landowners or managers (such as the Forest Service).

Comment: *Concerns with **weeds along all access roads** - they need to be treated. Sometimes access roads are owned by the county or others, and used by Bonneville and no one takes responsibility for treating weeds. [#13]*

Comment: *BPA has several transmission lines that cross the Colville National Forest. Many of these rights-of-way contain noxious weeds, and we are very concerned that if these infestations are not treated, they will remain a perennial source of reinfestation of adjoining National Forest System lands. [#24]*

Comment: *An individual from the Colville Tribe was concerned that noxious weeds were appearing everywhere on tribal lands. [#31]*

Comment: *Our greatest concern with the powerline corridors at this time is centered on noxious weeds. A sizeable population of spotted knapweed has been located within the corridor near Blue River along*

the McKenzie River. This species is considered a new invader and as such has the highest priority for treatment on this forest [Willamette National Forest]. . . . Each of the three corridors [in the Forest] also has large amounts of scotch broom, blackberry and other noxious weeds. We would like to work with the BPA to develop an active management strategy to address this concern. [#33]

Comment: *It seems to me [supervisor, noxious weeds program, FS] that there should be some shared responsibility for noxious weeds control in not only the right of way, but also the roads that access the towers. Portions of roads within the forest service road system, I am sure, are maintained and left open and maintained solely because of the need for access to the towers. [#38]*

Response: Thank you for forwarding your concerns. Where appropriate, your comment has been forwarded to the Natural Resource Specialist in charge of Bonneville's vegetation management in your area. Bonneville works with county weed boards and landowners or managers who have active noxious weed control programs. We often contract with county weed boards to treat rights-of-way in conjunction with larger scale treatments they may be doing in an area. Weed control is a larger picture than a narrow strip of land; weeds must be treated in an entire area or the control effort would be lost to surrounding infestations. Bonneville also has a program to give herbicides to landowners who are actively controlling weeds on their lands for right-of-way infested areas. On Forest Service lands, Bonneville will work with your overall programs to ensure that the rights-of-way and access roads are also treated.

Comment: *Page 56. Mitigation measures for noxious weeds. Bullet #6: Reseeding should follow all ground-disturbing activities to help compete with weed seed in the soil. All seed should be state-certified weed-free. . . . it would be more appropriate to use "when appropriate" not "when practical". [#33]*

Response: Thank you, the change has been made.

Comment: *Page 31, 4th par. Does this statement mean BPA has also worked with Hanford [for noxious weed control]? [#22]*

Response: Bonneville has worked with Hanford's noxious weed group in the past. Bonneville also works with the Benton County

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Weed Board that monitors and treats noxious weeds on transmission line rights-of-way that cross Hanford.

Comment: *I do not like current noxious weed control or lack of noxious weed control as currently practiced in Skamania County (west end) by . . . your Olympia Office. [#28]*

Response: Thank you for your perspective. Your comment will be forwarded to the Natural Resource Specialist in charge of Bonneville's vegetation control in Skamania County. It is Bonneville's intention to work with county weed boards and landowners with active noxious weed control programs for noxious weed control.

Comment: *I am also pleased to see your proposal to use bio-control and herbicides for these noxious weeds. [#10]*

Response: Thank you for your comment. Please note that Bonneville also supports research for noxious weed control. Bonneville has an annual \$25,000 contract with the Oregon Department of Agriculture that helps to support their biological control program with ongoing research to develop new insect methods to control noxious weeds. Current research projects focus on Gorse (Southern Oregon Coast), Scotch and French Broom (Willamette Valley), Leafy Spurge (Klamath Falls), and Spotted Knapweed (Central Oregon). In addition, Bonneville's helicopters are used to help map these infestations using global positioning system (GPS) and geographic information systems (GIS) technology.

Comment: *I am glad to see your continued hard-line approach to controlling noxious weeds. . . . I am most happy to see your continued supply of herbicides and biocontrol to landowners who have land where power lines travel through. [#10]*

Response: Thank you for your comment. We have had success with our limited program to provide herbicides to agricultural landowners for noxious weed control along the rights-of-way, and we plan to continue this practice. In the Eugene area, this program involves about 40 landowners at an annual Bonneville cost of \$10,000.

Comment: *Thank you again for the opportunity to comment. Please let us [Panhandle Weed Management Area Steering Committee] know if we can be of assistance. Partnering to control these invaders [noxious weeds] is the best way to ensure success. [#20]*

Response: Thank you for taking to the time to review our program and submit comments. We look forward to working with you.

Comment: *At first blush, it appears BPA is hoping to decrease man-hours and costs in annual treatments after the initial emphasis period. While such a goal can be realized, the fact is that noxious weeds can move in quickly without constant watchfulness to ensure they don't. In other words, don't turn your back after 5 years, hoping the good control you've achieved is all that needs to be done. . . . The Panhandle Weed Management members urge you to consider scheduled visits to the sites to ensure undesirable vegetation, and particularly noxious weeds, are controlled after your emphasis period is completed. Noxious weeds because of the longevity of viable seed, can quickly take over these sites even though you may have actively controlled the area for 5 years. Long-term monitoring will be required. [#20]*

Response: We agree. The decreasing need for right-of-way maintenance with our proposed alternatives is more targeted toward the tall-growing vegetation. Noxious weed monitoring is often on a different schedule than monitoring for tall-growing or access-blocking vegetation. The schedule is often dictated by the particular weed board in the area. Also, although the need to conduct maintenance may decrease, our right-of-way inspections will remain consistent, looking for both noxious weed invasions and tall-growing species that will still be able to establish (although less often).

Comment: *[I] like idea of vegetation management alternatives and discussing them with landowners. [#30]*

Response: The planning steps include notifying landowners (if they are potentially affected by our actions) to find out any issues that need to be considered when determining the appropriate methods to be used.

Comment: *[Pacific Power and Light forester]. . . [would you please] start notifying property owners when your crews are coming*

**Identify
Surrounding
Land Use and
Landowners**

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through a right-of-way performing vegetation management work. We receive many irate calls every year from customers who think that work that was done by your crews was done by us. We hav[e] to go out and investigate each of these calls which costs us a good bit of time. Your Vegetation Management Department could certainly improve your communications with your "neighbors" so that these folks know who to contact with their questions and/or concerns. [#11]

Response: Thank you for your comments. As part of our planning steps for site-specific vegetation control (Chapter III Site-specific Planning Steps) we will try to contact landowners over whose land our rights-of-way cross, during the planning for vegetation control. Public contact may take place in a number of ways: notice in a local newspaper, phone calls, meetings, letters, door-hangers. This commitment to landowner contact will provide more consistency in our notification.

Comment: *Will areas be surveyed in advance to ascertain the presence of organic farming operations (S-7)? [#26]*

Response: Sometimes organic farm operations are easily determined through right-of-way reviews (e.g., if they have signs) but we also depend on responses to our public notification of site-specific vegetation control to inform us of organic farming operations. We keep historical information of organic farming sites (as well as other resources or issues to consider) on our photomaps.

Comment: *I would like to see prior notification of exactly when our area will be aerial sprayed. This could be done through newspapers giving us a approximate date of application, and then you supplying us with a hot-line number to call to get a specific date and time (subject to change because of weather). We may have to call more than once as the hot line is updated. This would be so beneficial because we could keep our children in on that particular day and not allow them to play outside (especially beneficial for those of use who live very near power lines). We could also move livestock, change out water supplies, etc. just for safety measures. Also, I know you need to be in the growing season for aerial spray, but if there is any way you could spray before apples and berries have been set on (in other words, spray during the bloom stage - preferably before - (the earlier the better) this would greatly reduce any chance of ingesting contaminated*

fruit by our children. We do have orchards from old homesteads close to powerlines where drift could be questionable in my opinion. . . . All that I personally can ask is that you please keep us informed so that we have the opportunity to use as many safety measures on our behalf as we see fit to protect our families. [#27]

Response: Thank you for your recommendations and letting us know your needs and concerns. As part of our planning steps for site-specific vegetation control (Chapter III Site-specific Planning Steps) we will contact landowners over whose land our rights-of-way cross, prior to vegetation control. This notification will give approximate dates, methods being considered for use, and points of contact to call for additional information. We hope notification will give you ample time to contact us regarding any issues or scheduling that we need to consider as well as allow you to take measures you deem appropriate. In addition, aerial spraying will not be carried out in areas that are densely to moderately populated, and access points into the right-of-way will be posted with signs regarding aerial herbicide applications. Thank you for your suggestion of a Hot Line; we will consider it on site-specific projects.

Comment: *When you plan a specific project on the Colville Forest, we are more than willing to coordinate with you and help insure that the terms of the Mediated Agreement, as well as other applicable laws and regulations regarding vegetative treatment on National Forest System lands are followed. [#24]*

Response: Thank you. Your offer to help and coordinate has been forwarded to the Natural Resource Specialist in charge of Bonneville vegetation management in your area.

Comment: *Project Proposal Notification: Another bullet on page 58 under USFS managed lands needs to be added which includes BPA Project Managers notifying the FS in advance of any proposed projects (non-emergency) involving NF lands. This is needed in order that FS NEPA procedures are complied with. This requirement is already contained in the Right of Way Management Plan for BPA facilities on the Plains/Thompson Falls Ranger District, but I'm not sure of other Districts and Forests. [#36]*

Response: Thank you for the suggestion. There is a bullet in that section that requires managers to contact the local Forest Supervisor's

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or District Ranger's office before implementing vegetation management activities on National Forest Service lands. The bullet has been revised as suggested

Comment: *We look forward to working with you on site specific management plan updates for each of the three corridors that are located on the Willamette National Forest as a follow up to this EIS. [#33]*

Response: Thank you. We also look forward to updating plans. Please be aware that Bonneville will need to do so over the next few years. We expect that we will work on plans, as upcoming vegetation control is needed in that area.

Comment: *Detroit Ranger District personnel will be writing a comprehensive management plan for the Pacific Gas and Electric (PGE) powerline corridor, which parallels the Detroit BPA corridor for approximately 18 miles, in the next year, as a part of the relicensing process for the PGE corridor. It would be beneficial for BPA to be involved with this site-specific management because working together could potentially lower costs for both PGE and BPA for management activities, surveys, etc. It would be beneficial for the Willamette NF to have a single set of guidelines for managing both corridors. [#33]*

Response: Thank you for the information; it has been forwarded to the Natural Resource Specialist in charge of Bonneville vegetation management in your area. We agree that a combination effort in developing a plan could be beneficial to all parties and look forward to discussions with you.

Comment: *Page 58: Recommend that BPA also consider including, either in the selected alternative itself, or in the Record of Decision, specific direction that will require BPA's Project Managers to review all EXISTING site-specific vegetative management plans [on National Forest lands], for consistency with the selected alternative of this programmatic analysis, and to revise or amend those existing plans as necessary to make them consistent with the finding, standards, guides, management direction, etc. in the selected alternative/ Record of Decision of this EIS. [#39]*

Response: We agree that existing site-specific vegetative management plans need to be reviewed for consistency with decisions made through this EIS process. (A mitigation measure in the planning steps—FS-managed lands—addresses this need.)

However, we have also heard concern from specific Forests that the EIS should not supercede or revoke existing plans. The concern is that some might think that past agreements no longer apply. As we review and revise plans in cooperation with the appropriate Forest, both agencies will need to consider past agreements and right-of-way management plans and together decide whether they are still appropriate.

Comment: *CHAPTER III - SITE-SPECIFIC PLANNING STEPS*

Page 58: USFS-Managed Lands: Recommend revising the fifth bullet statement under this heading to read as follows: "If expecting the USFS to require environmental data collection for evaluation, allow more than one year for completion, and be prepared to reimburse the USFS for its cost to collect and analyze data, conduct the environmental analysis, document that analysis, and/or the cost to contract for such activities". [#39]

Response: Revisions to this effect have been made. Thank you.

Comment: *Page 58: USFS-Managed Lands: Recommend revising the seventh bullet statement under this heading to read as follows: "Comment and engage in all Forest Service proposals to revise or amend Forest Land and Resource Management Plans, to assure that the designation and management of utility corridors are adequately addressed wherever appropriate." [#39]*

Response: The revision has been made. Thank you.

Comment: *When planning ROW treatments on the Colville Forest, as well as other National Forest lands in Region 6, I want to remind you that BPA must also comply with the terms of the Mediated Agreement to the EIS Managing Competing Unwanted Vegetation. This document emphasizes prevention activities, but it also restricts the types of chemicals that can be used on National Forest System lands. [#24]*

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Response: Yes, we understand the need of certain Forest Service regions to comply with the mediated agreement. See Appendix F, FS Mitigation Measures and Background.

Bonneville understands that a mutually approved site-specific vegetation management plan with the Forest Service must be consistent with the appropriate Forest Plan. The Region 6 Forest Plans incorporate the Mediated Agreement. As a practical matter, Bonneville's vegetation management plans must comply with the Mediated Agreement before the Forest Service can approve them. Appendix F gives examples of special mitigation measures Bonneville will apply on Forest Service lands in addition to those discussed in Chapter III.

Comment: *Page 56, provides for the use of "public contact to help find out about any special uses of the land, or other issues or concerns that might need consideration when determining or scheduling vegetation control" on an only if needed basis. We suggest always use public contact and involvement within Modoc County. The Modoc County Board of Supervisors has established a land use committee to consider and comment on Federal Agency actions that may occur within the county. [#32]*

Response: Thank you for noting the need for clarification. The public would be notified of vegetation control projects that would potentially affect them (for example, notification would probably not be needed for weeding landscapes around a substation control house, but would be done for landowners that have easements crossing there land). The appropriate level of notification, involvement, or coordination would be determined at the site-specific level. Please note that public contact is used for a couple of reasons: to keep our neighbors informed of vegetation control activities on their land, and to help us determine uses of the land or issues that are not otherwise evident. We hope that the changes made in Chapter III, Step 2: *Identify surrounding land use and landowners/ managers* clarifies this.

Comment: *In the Siuslaw Forest, Waldport Ranger District, a major north-south BPA transmission line cuts a swath about 300 yards wide through areas of timber that will never be cut again under the National Forest Plan. These areas used to be sprayed with herbicides, creating a grassy meadow area miles long. As we understand the*

BPA-USFS agreement, these transmission right-of-way areas were supposed to be managed for "wildlife". Keeping the areas in a brush cycle now does not accomplish this earlier objective. We would like the BPA and USFS to honor their past agreement by keeping the areas in a grassy meadow condition. This would provide an alternative for wildlife such as deer and elk, etc. to the older forests surrounding these transmission lines. Could the BPA and USFS return to controlling brush (by mechanical or manual means) for grassy growth? [#18]

Response: Your comment has been given to the Natural Resource Specialist in charge of Bonneville vegetation management in your area. Please note that it is difficult to keep an area within a forest in grassy growth without some use of herbicides to control deciduous regrowth. The right-of-way is probably in a brush cycle now because herbicides are not being used. (We are assuming "brush" means thick medium-height vegetation, such as young deciduous trees with multiple stems). Manual or mechanical means of keeping this area in grass would require yearly mowings, which is a more time-consuming and expensive method than Bonneville can commit to. Please note that the right-of-way across the Waldport and Mapleton Ranger District is 50 miles long and 125 feet wide. Working with people from the Waldport and Mapleton districts, the right-of-way was recently cut by manual chainsaws and mowed by machines where terrain has allowed (October 1999 -January 2000). Vegetation was left in place at stream crossings for fish and water quality protection. Bonneville continues to coordinate with Forest Service staff on the feasibility of following-up with herbicide treatments to control deciduous species, primarily Red Alder. (We are in the process of completing a site-specific environmental analysis.) The overall goal for the right-of-way is to establish a quasi-stable native low-growing plant community. The low-growing plant communities have been found to be beneficial to a number of wildlife, not just big game. We hope that, through this coordination, Bonneville's Natural Resource Specialist and the Forest Service district can enhance wildlife while providing a relatively low-maintenance right-of-way.

Comment: *For any actions that may take place on the Hanford Site, BPA must consult with the US Fish and Wildlife Service which manages these lands for DOE-RL [and] . . . BPA must consult the document Biological Resources Management Plan.*

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Page 164, Herbicide Impacts: The Hanford site has a Weed Control Plan. A copy will be provided to BPA.

Page 165, Mitigation Measures: at Hanford a Cultural Resource Survey is needed before any ground disturbance is done. [#22]

Response: Thank you for the information. This information has been given to the Natural Resource Specialist in charge of Bonneville vegetation management in your area for use when working with you for vegetation management activities on the rights-of-way crossing the Hanford Reservation.

Comment: *Page 59, last bullet: add "and the U.S. Department of Energy." . . .*

Page 131, Land Use Section: Add a Section for the Hanford Site. Indicate that "Coordination must be done with DOE, Richland Operations Office and the U.S. Fish and Wildlife Service for actions that take place on the Hanford Site". . . .

Page 132, Under Washington add a discussion on Federal Lands in Eastern Washington, such as DOE. . . .

Page 135, 5th paragraph: U.S. DOE also complies with NEPA. . . .

Pages 184 and 185: Need to include discussion of other federal managed lands (DOE, etc.) [#22]

Response: Thank you for your comments regarding coordination needs with DOE on the Hanford reservation. We have added information to address federal lands (including Hanford) more completely in chapters III, V, and VI.

Identify Natural Resources

Comment: *However, since there are differences in environmental fate among herbicides, the use of generic riparian buffer and herbicide-free zones for all herbicide applications is not justified. [#40]*

Response: Thank you for your input. We have added the consideration of aquatic toxicity ratings to the process for determining buffer widths. At the site-specific level, Bonneville will consider all aspects of the herbicide formulation in determining appropriate herbicides and buffers widths for use.

Comment: *An analysis of the new (just now being drafted) Washington State Department of Ecology's Storm Water Manual - Vols 1-5. How will that document fit in? [#6]*

Response: Bonneville has reviewed the draft Manual; we would be in compliance with the Manual as written.

Comment: *What methodology is used to detect these [streams and wetlands] areas? During Rashin's pesticide study it was noted that not all stream channels were identified prior to pesticide application. Methods to identify flowing water included aerial viewing and road crossings. We suggest that all streams and wetlands be field verified and their buffers flagged prior to any maintenance activity. [#14]*

Response: Streams and wetlands would be identified with a combination of plan and profile maps, aerial photos of our system, USGS or other maps, and some field verification. Depending on the site-specific circumstances, buffers would be flagged. Applicators would have tools such as aerial maps of the right-of-way with buffer areas and other sensitive area information marked.

Comment: *Riparian Protection: 2) Table III-2 Herbicide Free Zones (page 62) should be expanded to describe how close to natural streams the various proposed herbicides can be used. [#36]*

Comment: *The management proposal does not address buffers on streams and wetlands. We have concerns about the protection of these critical areas and recommend the following: pesticides should not be used in areas associated with water or riparian/wetland vegetation. [#14]*

Response: Buffer zones for riparian areas are addressed in the EIS (Tables III-1, III-2, VI-2, and VI-3). These buffers consider herbicide application techniques; we have added the consideration of herbicide aquatic toxicity ratings in defining appropriate buffer widths. Buffer widths may be more strict than those proposed in the EIS, depending on site-specific requirements or circumstance.

Comment: *Due to the fact that there are a number of domestic water systems, particularly within the first four towers south of the Alsee River, I don't want to see any herbicide application in those areas.*

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They have a number of surface systems in the area and some wells south of the first four towers. [#25]

Response: Thank you for informing us of these water systems. Your comment has been given to the Natural Resource Specialist in charge of vegetation management in your area. With this information, the Specialist will know to provide adequate no-spray buffer zones around these sites. If you receive notification (through our planning steps) about upcoming vegetation management of lines in this area, it would be helpful to remind us of this information.

Comment: *[C]larify the language on page 61 under the Section 404 discussion. The sentence in parentheses should be revised as follows: (In certain circumstances vegetation debris left in a stream or wetland could be considered fill material for purposes of Section 404 of the Clean Water Act. Questions concerning the regulation of particular activities under Section 404 should be directed to the Regulatory Branch of the local U.S. Army Corps of Engineers District Office.)* [#34]

Response: Thank you. A change to this effect has been made.

Comment: *The Service agrees that the procedures outlined under Planning Step 3 will permit project managers to comply with the provisions of the Endangered Species Act, as amended. However, we recommend that BPA consider, for the sake of efficiency, a programmatic consultation at the appropriate level (e.g., state, watershed, or species). We also recommend that any such programmatic consultation address potential project impacts to all species proposed for listing, regardless of whether BPA reaches the statutory conference threshold of being likely to jeopardize such proposed species.* [#40]

Response: Thank you for noting that the procedures would allow for compliance with the Endangered Species Act. Bonneville has in the past entered into programmatic consultations for efficiency, and we will continue to do so where appropriate. For example, we are currently consulting with the National Marine Fisheries Service (NMFS) and USFWS on transmission facility maintenance activity effects on listed fish species throughout our service territory. As recommended, our normal practice is to consult on both proposed

species and listed species, whether our actions are likely to jeopardize the species or not.

Comment: *Canada Lynx - Due to the recent proposal to list the Canada lynx (*Lynx canadensis*) as threatened and potential impacts to lynx from the proposed vegetation management program, it is appropriate to provide comments specific to this species. . . . the Canada lynx is a USFS sensitive species, a Northwest Forest Plan "survey and manage" species (in Oregon and Washington), and is listed as a threatened species by the State of Washington. The proposed BPA vegetation management activities would potentially impact Canada lynx throughout their range. The abundance of snowshoe hares significantly influences lynx populations. Prime snowshoe hare habitat includes . . . conditions often found beneath BPA transmission lines at higher elevations. To be available for snowshoe hare during the winter months, forage cover must be 6 to 8 feet tall where average snow depth does not exceed 3 to 4 feet). Some hardwoods, particularly willow, are also used by snowshoe hares during the winter months). Providing adequate winter forage for snowshoe hares is a key component of maintaining or expanding snowshoe hare and Canada lynx populations. The habitat beneath transmission lines provides lynx forage cover if it consists of at least 4,700 stems or boughs per acre (1,210 trees per acre, 8 feet tall, with 6-foot spacing). This height and spacing provides adequate snowshoe hare forage and cover during average winter snow depths. The BPA management approach of promoting "low-growing plant communities" in rights-of-way using herbicides or other vegetation control methods is incompatible with management for hare and lynx. Impacts to lynx would be minimized by maintaining dense thickets of coniferous/deciduous vegetation of adequate height. [#40]*

Response: Bonneville does have some rights-of-way through Canada lynx habitat. Since your comment, the lynx has been listed as threatened. Bonneville will enter into consultation with USFWS as appropriate at the site-specific or programmatic level, and will need to follow specifications resulting from that process. This information has been forwarded to the Natural Resource Specialists in charge of vegetation management in areas with potential lynx habitat. (Please note that the existing rights-of-way have been in place for many years. Operation of these facilities requires vegetation control. Tall trees cannot be allowed to grow over a certain height in the right-of-way because of electrical safety and reliability reasons. Bonneville can not

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allow trees to grow more than 14 feet tall under most rights-of-way. Keeping trees 8 feet tall may not be feasible because of the constant cutting that would be required to keep them both tall enough for the hare and short enough for the lines. Remaining with a cyclical management approach, allowing trees to grow to the maximum allowable height, then cutting, would provide some snowshoe hare habitat for a short period of time before being cut. Converting the right-of-way to low-growing species may allow for naturally low deciduous thickets, but not conifers.) We hope that, through consultation, we can work through these issues for appropriate action. Thank you for reminding us of this issue.

Comment: *We recommend that you conduct detailed ground surveys for listed plant species, particularly *Spiranthes diluvialis* (Ute ladies' tresses) along the South Fork of the Snake River in eastern Idaho, prior to implementing any form of vegetation management in areas where this species is known to occur or areas that support potential habitat for this species. If this species is found in the project area, efforts to avoid impacts to *S. diluvialis* should be pursued. [#16]*

Response: Thank you for your recommendation. The planning steps require that the presence of T&E species be determined. For site-specific projects in areas that could support this species, ground surveys will be conducted and mitigation measures implemented, as appropriate.

Comment: *Finally, the document states that formal consultation is not needed for species previously consulted on, such as the marbled murrelet. . . . this program constitutes a new action and as such, if effects are likely to be expected from this new action, consultation on all currently listed species must be conducted. [#40]*

Response: The former consultations for marbled murrelet and spotted owl appear still to be valid for the timing restrictions and actions of manual and mechanical means of vegetation control and tree removal. For these actions, there is no new proposed action that has not been previously consulted. However, we realize that herbicide use (other than the physical presence of workers and noise disturbance) was not included in these prior consultations; therefore, new consultations would need to be done for these species for any herbicide

use. Thank you for bringing this to our attention. Changes in the text (Planning Steps) reflect this need for additional consultation.

Comment: *The corridor near Lowell was mentioned extensively in the watershed analysis for Lookout Point. The BPA corridor is located in and around western pond turtle (a Forest Service Region 6 sensitive species requiring special management) habitat. Specifically, timing of vegetation management needs to take into account the migration of pond turtle mothers through the corridor for nesting. [#33]*

Response: This is a good example of the type of information that needs to be used in developing site-specific right-of-way management plans with the Forest Service for corridors crossing Forest Service-managed lands. As you mentioned, in this circumstance an appropriate mitigation measure would be to time vegetation management activities so that they would not interfere with the migration of mother pond turtles. Your comment will be forwarded to the Natural Resource Specialist in charge of Bonneville vegetation management activities in your area.

Comment: *Page 174, Mitigation Measures: Hanford shrub-steppe has not been designated as Critical Habitat, but the State of Washington has classified it as "priority habitat." [#22]*

Response: Thank you. We have added a mitigation measure to contact state agencies to determine potential impacts (and ways to avoid impacts) on state-listed species and habitats.

Comment: *We applaud BPA's effort to integrate environmentally preferred alternatives into the program and encourage the implementation of any habitat enhancing measures for fish and wildlife that can be undertaken as part of the program (i.e., allow for the growth and establishment of low growing vegetation, leave debris and brush piles in place to provide habitat, and top trees while leaving the stumps in place). [#40]*

Response: Thank you for your comments. We hope to promote low-growing vegetation along the right-of-way where possible. The other type of measures (leaving brush piles and topping trees) that you have mentioned can be carried out at many sites, depending on the

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landowners and other particularities of the site (fire potential, visual sensitivities). We have added these measure to the planning steps for consideration when possible.

Comment: *Prior to the site specific use of chemical control methods via spot, localized, broadcast and especially aerial applications, we urge BPA to work closely with the [USFWS's] field offices to minimize effects to non-target species. [#40]*

Response: We agree. Bonneville plans to work with the USFWS prior to site-specific actions as outline in our planning steps.

Comment: *Fourth, the mitigation measures for soils state BPA will "consider reseeding or replanting seedlings on slopes with potential erosion problems." (emphasis added) The Department requests that BPA actually reseed or replant seedlings on slopes with potential erosion problem (rather than just considering doing so), for slopes with 10 percent of soils exposed. [#21]*

Response: Thank you; we have changed the mitigation measures to read "Reseed or replant on slopes with potential erosion problem, and/or take other erosion control measures as necessary."

Comment: *This letter is to reiterate and clarify previously communicated concerns and recommendations of the Klamath Tribes on the Draft EIS for the BPA Transmission System Vegetation Management Plan. The Klamath Tribes' Natural Resource Department has reviewed the DEIS. The DEIS was also discussed with the Klamath Tribes' Culture and Heritage Department Director. Following are comments and recommendations.*

It is important to ensure that proper consultation occurs with potentially affected tribes during NEPA planning of site-specific vegetation management projects. Though chapter three includes text pertaining to tribal consultation, this section [should] be revised to more clearly describe the need for tribal consultation.

Maps of the general area of concern to the Klamath Tribes are enclosed for reference and, if appropriate, inclusion into the Final EIS. Additional pertinent information on the history of the Klamath Tribes is also included.

The enclosed maps depict the area recognized by the U.S. Government as the homeland of the Klamath, Modoc, and Yahooskin Band of Snake Indians during negotiation of the Treaty of 1864 (CEDED LANDS). [Now jointly referenced as the "Klamath Tribes."] In terms of cultural resource protection and management, the homeland of the three tribes is often referred to as "The Klamath Tribes' Area of Cultural Influence." Because artifacts attributable to the Klamath Tribes have also been discovered outside the area depicted on the maps, it is recognized that the maps describe only the Tribes' general area of concern.

[N]ote that this area was not used exclusively by the Klamath, Modoc, and Yahooskin Band of Snake Indians, and that historical use by other tribes and bands overlap in some areas.

Though the Klamath Tribes were "terminated" from federal recognition as an Indian tribe in 1954, the Tribes' rights to hunt, fish, trap and gather, free of state and federal regulation, survived "termination." The Tribes currently exercise these rights within the former reservation boundary. In addition, there are locations outside of the 1954 Treaty Boundary within the Tribes' area of concern where tribal members continue to gather traditional plants, roots, berries, etc., and where other cultural, religious, and spiritual activities are practiced.

Because of potential impacts to fish, wildlife, and their habitats, plants and other resources pertinent to the exercise of treaty rights, it is imperative that the Tribes be consulted during consideration and planning of site-specific vegetation management projects within and adjacent to the former reservation boundary area. It is important to note that because of the migratory nature of fish and wildlife species relied upon by the Tribe's management concerns often extend beyond the former reservation boundary.

Because of potential impacts to cultural resources, and cultural, religious, hunting, fishing, gathering and other Treaty uses, the Klamath Tribes request to be informed of all site-specific projects that will be considered or planned within The Klamath Tribes' Area of Cultural Influence.

Where appropriate, the Tribes may wish to participate in development of site-specific mitigation measures to ensure protection of cultural resources and cultural/religious uses and values important to the Tribes. [#42]

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Response: We appreciate the Klamath Tribes' time taken to review and comment on Bonneville's EIS. We acknowledge that the Klamath Tribes has membership of three distinct Tribes that exercise hunting, fishing and gathering rights within former Reservation boundaries and areas of concern. As suggested, we have revised Planning Step 3, Identify natural resources, cultural resources, to clarify the need to coordinate and consult at the site-specific level to determine potential impact on cultural resources. It is at the site-specific level that we can determine together the appropriate mitigation measure, if needed. We have forwarded the maps you have provided to the Natural Resource Specialist in charge of Bonneville's vegetation control in your area, so the Specialist will know where to engage the Tribe in consultation on projects. We look forward to your participation at the site-specific level. Thank you again for your comments.

Comment: *An individual from the Confederated Tribes of the Warm Springs Indian Reservation that worked in cultural resource section commented that Bonneville needs to consider the value of the Tribe's cultural site when planning vegetation control activities. [#31]*

Response: Bonneville will look to the Confederated Tribes of the Warm Springs Reservation to provide information regarding the value of the Tribes' cultural sites when planning vegetation control actions on rights-of-way over the Reservation and ceded areas. In this way, the Tribes can make sure there is appropriate consideration of their Tribe's cultural sites when Bonneville makes decisions about control methods.

Comment: *Tribal fishing, hunting and plant gathering areas extend much farther than reservation boundaries, and include the traditional use areas of the twelve tribes comprising the Colville Confederated Tribes. Because the Tribes retain rights in ceded and traditional use areas, Tribal representation on ROW management plans developed for off-reservation areas used by the Tribes (in addition to management plans for the reservation) are necessary.*

Snoqualmie Pass, Moses Lake, Stevens Pass are some examples of Colville Confederated Tribes gathering areas. Some of the plants that are gathered annually by Tribal members include huckleberry, elder berry, mushrooms, willows, a variety of celery's, potatoes, carrots, camas root, bitter root etc. We should have the opportunity to

represent our interests in areas that are traditional [Colvilles did not sign any document abdicating their rights.] [They will send Bonneville a map of Colville's traditional use areas.] Spiritual values of burial sites must be considered as well as managing ancestral remains. Although you may not disturb the ground, herbicide spraying above the ground may impact spiritual value. If lines cross burial sites, some tribal members would not like herbicide used on those sites - others might want herbicide use if it controls knapweed.

This is an opportunity for weeds to be managed together with cultural resource and traditional use area management. [#13]

Response: Thank you for reminding us of the need for your input in areas outside of Reservation boundaries, and in traditional use areas. Bonneville has included in the final EIS, as part of our planning steps, a need to notify interested Tribes of up-coming site-specific vegetation management activities in areas of interest to them. This contact would be done to determine the presence of traditional gathering plants or other cultural resources and to determine the desired level of involvement of the tribe. We look forward to the opportunity to manage weeds together with cultural resources and traditional use area management. Please see additions in Chapter III, and Chapter VI cultural resource sections.

Comment: *It is a federal responsibility to identify and avoid burial sites if present. Even if identified, burial sites are not always managed respectfully. To better ensure burial sites aren't impacted during vegetation control activities, burial site locations should be recorded in a database so information is retrievable and accessible to managers prior to issuing work contracts. [#13]*

Response: As a federal agency, Bonneville must determine whether its actions could potentially affect historic and cultural resources (i.e., whether actions could cause impact and whether the resources are present). If Bonneville's actions could affect burial sites, then we must determine whether sites are present. By engaging Tribes on site-specific projects in their interested areas, we hope that the Tribes will be able to help determine potential for impacts.

Regarding databases of burial site locations, this undertaking would need to be considered area by area, with consideration of the area Tribes' sensitivity to recorded locations that are easily accessible.

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Comment: *Thank you for the chance to comment on the Bonneville Power Administration's Transmission System Vegetative Management Program DEIS. Our meeting with Stacy Mason of the BPA was very informative and we consider this meeting the beginning of a cooperative effort to protect cultural resources on BPA managed transmission rights-of-way. [#41]*

Response: We thank you for taking the time to review the EIS, meet with us, and submit comments on our program. Your comments are essential to ensure that site-specific work is done in consultation with the Confederated Salish and Kootenai Tribes.

Comment: *. . . we wish to address the apparent lack of an intensive cultural resource survey within the BPA transmission line corridors and at electrical facilities on and adjacent to the Flathead Indian Reservation. We are unable to locate any record concerning prior cultural resource survey or National Historic Preservation Act consultation with the Confederated Salish and Kootenai Tribes on BPA transmission lines on or off the reservation in northwestern Montana. Lacking specific cultural resource data, it is simply impossible to assess proposed vegetation control impacts on cultural resources, or ongoing impacts to cultural sites from other transmission line management activities. [#41]*

Response: We recognize that many of the lines were built before the Section 106 of the National Historic Preservation Act regulations that are now in place; as such, cultural resource surveys may not have been conducted. In the past we have assumed that, if there were no ground-disturbing actions taking place within the right-of-way, surveys were not needed. However, we acknowledge that your views may differ in this respect. We will work with you to address these concerns as we develop a right-of-way management plan together.

Comment: *. . . for the Confederated Salish and Kootenai Tribes, cultural resources include traditionally used cultural plant communities and plant harvest and processing areas as well as archaeological properties. Tribal elders have expressed their concerns in the past that chemical agents may pollute the native cultural plants they use for food, medicine and ceremony. Therefore, we believe that certain manual, biological and chemical vegetation control measures can adversely impact traditional cultural use*

properties and archaeological sites, and that these impacts should be taken into account under Section 106 of the National Historic Preservation Act. [#41]

Response: We are confident that, by working together and developing courses of action (such as identification of cultural plants, timing restrictions, posting of treated areas, or a need to only perform spot treatments of herbicides on targeted plants), we can alleviate concerns of potential polluting of native cultural plants.

Comment: *The Confederated Salish and Kootenai Tribal Preservation Office is responsible for protection of historic and prehistoric cultural resources on the Flathead Indian Reservation and also has an obligation to protect cultural resources off the reservation within our ceded or aboriginal territories. These rights and responsibilities are clearly delineated within the 1999 revised regulation for implementing Section 106 of the NHPA. Therefore we provide the following recommendations.*

- *Implement a cultural resources inventory including a traditional cultural plant survey within the transmission line corridors and electrical facility sites on and adjacent to the Flathead Indian Reservation to identify cultural plant communities and other cultural resources.*
- *Develop a right-of-way management plan in consultation with the Confederated Salish and Kootenai Tribes for power system corridors on and adjacent to the Flathead Indian Reservation.*
- *Employ tribal members to perform management tasks on and adjacent to the reservation.*
- *Use Confederated Salish and Kootenai Tribes vegetative guidelines on and adjacent to the Flathead Indian Reservation.*
- *Define a consultation protocol with the Confederated Salish and Kootenai Tribes Preservation Office for potential impacts to cultural resources on and off reservation.*

We look forward to an opportunity to meet with you or your staff soon to discuss these recommendations. We believe that it is critical to continue consultation with Joanne Bigcrane, Confederated Salish and Kootenai Tribal Ethnobotanist, concerning native plant revegetation and the posting of chemically treated plants in plant harvesting areas.

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Our staff is also prepared to undertake the cultural resource studies recommended above in conjunction with the Salish and Kootenai Culture Committees and the Elders Advisory boards. [#41]

Response: Thank you for letting us know your interests, responsibilities, and recommendations regarding our vegetation management activities and cultural resources in your area of interest. We recognize the Confederated Salish and Kootenai Tribes' rights and responsibilities for protection of historic and prehistoric cultural resources. We look forward to developing a right-of-way management plan in consultation with your Tribe in order to address the recommendations you offered here. As we have discussed with you, a qualified person on our staff has been assigned to work with your staff on these recommendations.

Determine Vegetation Control Methods

Comment: *Mechanical methods should be used sparingly, and only where soil conditions and wildlife can readily tolerate such invasive procedures. [#26]*

Response: We agree. Soil-disturbing mechanical methods would be used only in certain situations, such as where total vegetation management is needed (because of the non-selective nature of this type of mechanical clearing), where slopes are less than 20%, and when the ground is sufficiently dry to sustain heavy equipment.

Comment: *...consider applying the herbicide at less than the maximum label rate where the lower level is efficacious. [#34]*

Response: Thank you for your comment. Manufacturers and EPA have attempted, as best as possible, to minimize herbicide use by very carefully outlining application rates that are most effective for the type of target plant and application method. To use *less* than the amount indicated on the label for a particular plant or application method runs a real risk of under-application. The target plants would then require a second application at the recommended rate. This would not only increase the amount of applied herbicide, but would also double all of the risks associated with applying the herbicide in the first place.

Comment: *As part of Planning Step 4 (Determine Vegetation Control Methods), specific weather restrictions are presented as one mitigation measure to reduce herbicide drift and leaching. However, as*

described in Chapter IV, geology and soil types also are important in determining if herbicides will migrate to water resources. We recommend that climate, geology, and soil types be included in Planning Step 4 as factors to consider in selecting vegetation control methods. [#40]

Response: Thank you; we have added consideration of climate, geology and soil types in the selection of the herbicide active ingredient and formulation (granular versus liquid).

Comment: *Vegetation management projects should select herbicides, application rates, and methodologies that are the least disruptive for adequately controlling the weed situation. [#34]*

Response: We feel that the planning steps will provide good guidance for an integrated management approach to choosing methods that are the least disruptive.

Comment: *We also suggest the use of secondary containment of chemicals during transportation and storage to reduce the risk of a spill. Due to the potential for additive and synergistic interactions between chemical compounds, the use of two chemicals as a mixture should be used sparingly and with great caution in order to minimize environmental repercussions. It is imperative when formulating your tiered project specific planning steps to take into consideration the comments listed above. [#40]*

Response: Bonneville stores herbicides in specially designed "herbicide storage buildings" that have secondary containment as well as other unique features. The transport of herbicide requires special licensing by each state within Bonneville's operating area. In addition, the herbicides must be properly loaded, placarded, etc. Not all of the chemicals listed by Bonneville can legally be mixed. Those that can be mixed have been considered; they are identified and listed on the toxicological tables (Tables VI-6 and VI-7).

Comment: *An individual from the Confederated Tribes of the Warm Springs Indian Reservation commented that extreme care should be taken to ensure that herbicides are correctly applied. [#31]*

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Response: We agree. Bonneville intends to fully carry out all application instructions, as provided by the label of the registered product, particularly with respect to human health standards and environmental hazards. In many cases Bonneville will exceed the label instructions by applying its own best management practices (BMPs), i.e., use of riparian buffer zones and pesticide-free zones.

Comment: *Will Bonneville map all rights-of-way to determine soil conditions, slope, etc. in order to determine whether or not granular herbicides should be prohibited (S-7)?* [#26]

Response: Mapping of general soil types both along rights-of-way and at substations will be available for use when determining which herbicide active ingredient and formulation (granular versus liquid) to use.

Determine Debris Disposal and Revegetation Methods

Comment: *Will BPA allow removal of vegetation along the right-of-way by the general public?* [#30]

Response: Bonneville's rights-of-way are easements across private, public, or other landowners' land. Those landowners may control the vegetation under the line on their land. However, if tree heights come within a certain distance of the line (the *minimum approach distance* – please see Appendix E for more information on Clearance Criteria), the vegetation must be removed by an electrically qualified person for safety reasons. Since Bonneville does not own the land under most of our rights-of-way, we can not give permission for the general public to clear vegetation along the right-of-way.

Comment: *Reseeding (S-9). When reseeding is undertaken, will native species be used? Will the Administration select plants that will provide food, hiding cover, thermal cover, nest sites, etc. for grizzly bear, elk, migratory birds and other wildlife?* [#26]

Comment: *We recommend seeding only native and preferably indigenous plant and grass species. Using native/indigenous species which are climatically adapted to geographic areas raises the survivability rate and helps control the introduction of non-native/noxious weed species. Studies have also shown that native, indigenous plant species provide higher food values to animal species adapted to these regions.* [#14]

Response: Thank you for your questions/suggestions regarding native seed species. Bonneville uses native seed to the extent practicable. When considering the appropriate seed, we consider 1) the need for reseeding (whether to control erosion, help establish low-growing plant communities, or to replace a noxious weed community), 2) the ability of the seed to establish, 3) other site circumstances (such as wildlife or forage enhancement), and 4) the costs.

Bonneville often defers to the state fish and wildlife department for recommendations of species helpful to wildlife. Non-native species that will take hold and compete against noxious weeds are sometimes a better option than native species. However, our seed mixtures generally do carry a high percentage of native seeds that would also provide wildlife benefits. Also note that the seed mixtures Bonneville uses are certified as free from noxious weeds.

We try to use native seed where possible, but such use is not always feasible or suitable. Often we use a mix of native and desirable non-native species. In all cases, more than one goal or purpose can be met by species selection, or by developing mixtures of species that address the many site variables on each treatment project. Bonneville uses expertise from many sources to help select and establish vegetation on projects, including Cooperative Extension, Washington State Department of Fish and Wildlife; agricultural colleges and universities; and the Natural Resource and Conservation Service.

Note that native seed is not always part of recommendations for wildlife values. For example, to benefit big game and wild turkeys, the Washington State Fish and Wildlife Department often recommends seed species that includes a variety of desirable non-natives such as white, red, Dutch, and ladino clover; birdfoot trefoil; and ranger alfalfa.

The costs and availability of native seed can make it unfeasible for exclusive use. In some places the costs can be as much as ten times the cost of desirable non-native seeds.

Some recent Bonneville reseeding projects used mixtures with 25-45% native seeds by weight. The mixtures included big bluegrass, sheep fescue, slender wheatgrass, thickspike wheatgrass, Basin wildrye, small burnet, and western wheatgrass, which are all classified as native species for the area in which they were used. These species have been readily available and are easy to establish on right-of-way sites. They have other values as well: slender wheatgrass, western wheatgrass, and thickspike wheatgrass are sod-forming grasses that are considered

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to be competitive with tall-growing species; sheep fescue is showing an ability to be competitive against some noxious weeds such as yellow star thistle, and big bluegrass has a high value in wildlife plantings.

Prepare Appropriate Environmental Documentation

Comment: *BPA can greatly assist Forest Service decision makers by documenting environmental effects and considerations in a more complete statement than a checklist* [#32]

Response: The Bonneville environmental documentation will be in the form of a Supplemental Analysis tiered to the EIS, as appropriate. Some clarification has been made in the Planning Steps, Prepare Appropriate Environmental Documentation section.

Other Requirements

Comment: *Page 195, last paragraph: is "nearby residents" an Environmental Justice concern? Are there lower income people that live closer to the corridors than others?* [#22]

Response: There are residents of varying income levels and races who live along our lines. Program-wide, there is no clear income level or race that is more or less likely to live along the line (many of our lines originally crossed farmland or forest land that has since been developed into suburban housing). When new lines are located, environmental justice issues are considered when determining appropriate routing alternatives.

Comments and Responses to *Program Alternatives* (Chapter IV)

General

Comment: *I do not like: the policy that "no action" could be considered a management action.* [#2]

Response: Federal agencies are required to consider the "no-action" alternative when making decisions that could affect the environment. The no-action alternative in the context of this EIS means "keep doing what we are doing now," or current practice.

Comment: *I do not like the use of "Environmentally Preferred Alternative". This reference is not in the best interests of long term*

vegetation management. Invasive weed species without their natural parasites or pathogens from their original homeland love to flourish in these areas. Uncontrolled rapid growth of exotic weeds is not in the best interests of the environment. A do nothing approach as suggested by anti-herbicide groups is definitely anti-environmental. [#8]

Response: NEPA requires Bonneville to identify the alternative we have found to be the most *environmentally* preferred (this doesn't include cost or reliability factors). We think that the environmentally preferred alternatives are MA2, R2 (mixed methods with spot and localized herbicide applications), and VS2 (herbicide applications for noxious weed and deciduous species only). We assume by your comment that you feel noxious weeds can't be controlled effectively by limiting noxious weed treatments to spot or localized herbicide treatments. We agree that noxious weed control would be difficult with backpack sprayers alone. Bonneville relies heavily on working with county weed boards that treat our corridors as they treat much larger areas of infestations. Given that, the environmentally preferred alternatives for the methods package would actually be a combination of R2 (for tall-growing species) and R4 (for noxious weed control).

Comment: *You can improve the choices by being scientific and not giving in to public action groups that claim to be "environmental."* [#8]

Response: Our goal is to objectively analyze the need and the potential impacts, develop mitigation measures to reduce impacts, and hear all public comment. Public comment helps us make sure we have considered all aspects of the program needed to make good decisions.

Comment: *Overall we feel the document does a good job of providing alternatives for management of vegetation . . .* [#33]

Response: Thank you for your comments.

Comment: *EPA has rated this DEIS EC-1. The rating of "EC" indicates that EPA has environmental concerns with the preferred alternatives. We suggest measures to reduce the environmental impacts of these alternatives. The rating of "1" indicates that the analytical information presented is adequate, although we suggest some clarifying language.* [#34]

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Response: Thank you for taking the time to review and offer measures to further enhance the program. Please see your other comments through out this chapter for responses.

Comment: *The [Panhandle Weed Management Area Steering Committee] voted unanimously to support BPA's preferred alternative for vegetation control. [#20]*

Response: Thank you for your comment and support.

Right-of-way Management Approach

Comment: *I prefer: . . . MA2. You can improve the choices by: eliminating all but . . . MA2. Do not weaken your position or stance by accepting any choice but . . . MA2. [#2]*

Comment: *I prefer MA2 on right-of-way. Your idea of controlling all vegetation as necessary while establishing ground cover will prove to be the best economically and environmentally. [#28]*

Comment: *Of the choices offered in the Draft EIS, I prefer any methods that give the biggest amount of tools in the tool box. This appears to be . . . MA2 . . . Anytime we can save money on high cost items - especially labor - and still reduce weeds and propagate a plant community of desirable vegetation that will reduce weeds and tall plants, I'm all in favor of it. [#8]*

Comment: *Approach: We support the overall approach described in Alternative MA2 using Integrated Vegetation Management. We feel as if the overall management strategy, to focus on creating low-growing (preferably native) plant communities under powerline corridors, is a sound one. [#33]*

Comment: *EPA agrees with Bonneville's preferred management approach (alternative MA2) that allows use of herbicides in combination with other methods to promote low-growing plant communities at rights-of-way. This approach should minimize impacts on non-target species. [#34]*

Response: Thank you for your comments and support.

Comment: *I would vastly prefer a hedgerow approach where low growth vegetation is promoted to limit destruction of fish and wildlife habitat. . . . We need to keep as much green stuff as we can in a number of species, not just grass. [#15]*

Response: We agree; thank you.

Comment: *What low growing species do you plan to use that will out-compete noxious weeds? [Are any low growing species] suitable for roadside use? [#28]*

Response: It is difficult to out-compete noxious weeds; that is why they are a problem. Reseeding disturbed areas with desirable grasses and shrubs will help. Below is a list of low-growing species that are desirable in the rights-of-way or along our access roads.

grasses	ninebark	rabbitbrush
sedges	vine maple	vaccinium
forbs	<14 ft. tall	bitterbrush
legumes	manzanitas	snowberry
bracken fern	rhododendron	rosa
salal	current	ceanothus
bearberry	sagebrush	Oregon grape.

For desirable plants along county or city roads, we would refer your question to a local road department.

Comment: *Alternative MA2 (S-11) [Alliance for the Wild Rockies (AWR)] supports this alternative assuming that native plants will be used and habitat improvements will be incorporated into this program. The reliance on spot-herbicide treatments should be minimized or eliminated. . . . AWR supports the MA2 alternative, with a focus on manual and biological control agents. [#26]*

Response: Overall, Bonneville would rely on promoting low-growing plant growth on rights-of-way. Actual plantings or reseeding would only be done in specific circumstances (e.g., potential erosion areas, places where natural revegetation is not likely). Low-growing plant growth can be promoted by eliminating tall-growing vegetation before it is tall enough to shade or compete with other desirable species, treating deciduous tall-growing species with herbicide to ensure there will be no resprouting, and performing maintenance using selective methods that will not disturb existing low-growing plants. Plants to revegetate the space will be those that can be seeded from surrounding plants or that are in the soil and will sprout with favorable

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conditions. Whether native plants or seeds are used for plantings or reseeding would depend on many factors.

Comment: *In your Right-of-way Program, we support Alternative MA2 (promotion of low-growing plant communities). [#29]*

Response: Thank you for your input. We note that you support MA2 if herbicides are used for noxious weeds only (your support for VS1 is expressed in a subsequent comment). Based on our analysis and observations of the success of other utilities, we think that promoting low-growing plant communities would lessen both environmental impacts and maintenance costs in the long run. Though you support Alternative MA2, you also support Vegetation Selection VS1. Please note that it is not feasible to "arrive at" low-growing plant communities without some herbicide use to control deciduous tall-growing species. When cut, deciduous species resprout rapidly and grow back more densely than before they were cut. We have found that if we do not treat the plant so that it stops growing, we can not get to a community of low-growing plants that requires little vegetation maintenance.

Comment: *I would like to see consideration given to native vegetation to propagate your plant community, not just low growing grasses and forbs from where-ever. [#8]*

Response: Most of the low-growing vegetation will not be from seeding or plantings, but will occur as the natural vegetation encroaches from the adjacent landscape. (For example, in some places where we have promoted low-growing plants, grasses, rhododendrons, hazelbrush and snowberries have established on site.) If noxious weed encroachment is a potential, then reseeding with a mix adaptable to the site would be used.

Comment: *The [Squaxin Island] Tribe advocates the use of manual and mechanical methods as well as the planting of low growing native plant species. . . . The Tribe supports the use of low growing vegetation to out-compete other plant communities as a way of controlling undesirable plant species. [#14]*

Response: Thank you for your perspective.

Comment: *Low-growing is better than herbicides. [#30]*

Response: We agree that the ultimate way to control tall-growing vegetation on the rights-of-way is to have low-growing plants that keep the tall-growing plants from sprouting in the first place. Getting to low-growing plant communities will take several cycles of maintenance that, in many cases, will require the use of some herbicides. Once low-growing plants are established, there will still need to be a mix of methods to treat/cut the tree saplings that are able to sprout through the ground cover of low-growing plants.

Comment: *You may wish to consider cycle length and type of cycle in your evaluation. Frequently vegetation on an entire rights-of-way does not develop at the same rate. However, a utility frequently treats everything as the slower growing vegetation will not wait until the next cycle. We utilize a "just in time" cycle. In this cycle, a vegetative cover type or tree is not worked until actually needed. THIS REDUCES THE COST PER YEAR TO MAINTAIN THE ENTIRE SYSTEM. Cycles within cycles require more intense planning and are trickier to manage but can reduce the frequency of impact for many sites and save money. A "just in time" cycle also reduces the visual impact to a right-of-way. [#5]*

Response: Thank you for offering this consideration. We believe this approach falls within Alternative MA1, Time-driven, because it calls for a cyclical vegetation management, with more frequent cycles. We didn't break this multi-cyclic process out of Alternative MA1 because, although specific vegetation may not be affected as often with this approach, overall impacts could be greater because of increased number of site visits and the cutting of larger trees. It would also seem that costs could go up for the same reasons. Reliability could be a problem when waiting to cut trees just before they become a threat to the lines, because there is a greater potential for some trees to grow more quickly than expected and actually grow too close to the lines.

Comment: *Based on my personal scientific and technical knowledge, I believe the use of a combination of the chemical, mechanical and manual methods outlined in the EIS will be effective and can be carried out with little or no adverse environmental impact or impacts on the health of humans. [#19]*

**Right-of-way
Methods Package
Alternatives**

Public Comments and Responses

Comment: *In general the [USFWS] supports the integrated approach which uses manual, mechanical, biological, and chemical methods to control vegetation on Bonneville Power Administration's (BPA) electric facilities, namely rights-of-way, electric yards, and non-electric facilities. [#40]*

Response: Thank you for your scientific review and comment. We think that this integrated approach is a good combination of providing effective vegetation control and environmental stewardship.

Comment: *I prefer: R2. [#7]*

Comment: *Alternatives R2 or R3 are both consistent with the methods outlined in our new EA. The Willamette EA addresses manual, mechanical, biological and herbicide control methods in powerline corridors. Treatment methods will be dominantly spot and localized, although some boom spraying from ATV's or trucks could be done. [33]*

Response: Thank you for your comment.

Comment: *We support Method package R3 (herbicides permitted with spot, localized, and broadcast application). [#29]*

Response: Thank you for stating your preference. We note that you would prefer that herbicide applications be used for noxious weed control only (your support for VS1 in a subsequent comment). As part of our program to help control noxious weeds throughout our system, we work with county weed boards. Some of the county weed boards and private landowners use aerial applications for treatment of weed infestations in their areas. We team with some of these parties to monitor and treat our rights-of-way as part of their area-wide treatments. Method package R3 would eliminate this possibility.

Comment: *I prefer: R4 You can improve the choices by: eliminating all but . . . R4 . . . Do not weaken your position or stance by accepting any choice but R4. [#2]*

Comment: *Of the choices offered in the Draft EIS, I prefer any methods that give the biggest amount of tools in the tool-box. This appears to be R4 [#8]*

Comment: *[Because of concerns for noxious weed control] we are supportive of your preferred alternative R4, which approves all methods of control. [#24]*

Comment: *R4, best alternative. [#28]*

Response: We also like this alternative because it gives us the most flexibility for the many different site-specific situations. We would combine this alternative with the planning steps to help determine the appropriate tools for the given environment.

Comment: *BPA needs to keep all possible methods of "management" available to maintain safe and effective power production and transport. [#2]*

Response: Thank you for your comment. Having all possible tools in the tool box allows us the most flexibility in determining the best way to control vegetation on a particular site.

Comment: *I believe we can use herbicides to establish this desirable plant community, then, over time reduce the use of herbicides down to as necessary to combat invasive weeds that have no pathogens or parasites to keep them from spreading rapidly. If the above [R4, VS3] alternatives are not followed, I think this would open up enforcement actions by both State and County Noxious Weed Authorities. This would result in fines and the work being done on large scale treatment and large amounts of herbicides which may or may not be on your approved list. [#8]*

Response: We agree. However, please note that we would not use herbicides that had not been through our process for approval.

Comment: *I am against any use of herbicides. [#9]*

Comment: *. . . we feel that the proposal is biased towards the use of herbicides rather than manual or mechanical forms of vegetation control. . . . While the [Squaxin Island] Tribe does not oppose the use of pesticides, we recommend that pesticides only be used as a last resort when other strategies have failed or are impractical. . . . For vegetation control we support the use of mechanical and manual methods. Soil disturbance can be kept at a minimum by raising mower heights as well as using vegetation species which do not require*

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maintenance. . . . We support utilizing these methods for primary control and the use of pesticides only in extreme circumstances. [#14]

Comment: *AWR appreciates the Administration's need to control vegetation. However, based upon [discussion of concerns] the use of chemical control agents should be revisited. [#26]*

Response: Thank you for your comments regarding herbicide use; we appreciate your perspective. Please note that, for all of the proposed right-of-way alternatives, Bonneville would still rely heavily on manual methods of vegetation control (Figures IV-3, -4, -5, and -6).

Unfortunately, using herbicides only in extreme circumstances will not get us to a long-range goal of low-growing plant communities. Through past practices and experience of other utilities, we have found it difficult to keep up with vegetation growth without using herbicides for at least noxious weed control and deciduous species.

If we are able to use herbicides, together with other methods, to promote low-growing plants, we will be able to lessen the need for *all* maintenance activities, including herbicide use. We think that, in the long run, low-growing plants on the right-of-way by means of the integrated, judicious use of herbicides (not just as a last resort) will be the best for Bonneville and the environment.

Comment: *In particular, herbicide applications do nothing to change the conditions which allowed the noxious weeds or other vegetation to establish in the first place, and such applications may leave the soil bare, a condition that favors re-establishment. Therefore, the dependency on toxic chemicals to manage vegetation is difficult to overcome unless it is part of an explicit program to prevent the re-establishment of such vegetation and to eliminate the need to use herbicides in the future. [#26]*

Response: We agree that if herbicide applications resulted in bare-ground rights-of-way, then noxious weeds could reestablish. We are proposing an integrated approach of control that considers ways to prevent reestablishment of undesirable species, including promoting low-growing plant communities, reseeding where necessary, and timing of removal or treatment. (Note that herbicide treatments can often be less likely to leave bare soil than manual or mechanical means, because the herbicide kills roots without disturbing the soil.)

The use of some herbicide is an explicit part of the management goal of promoting low-growing plants along the rights-of-way. With this management goal, we hope to change the plant community on the right-of-way to be compatible with our needs, rather than keep fighting the battle with tall-growing plants. With this change there would be much less need for herbicide use in the long run, because there would be less need for maintenance in general.

Comment: *If you decide you must use herbicides (which I strongly protest), aerial and broadcast spraying should absolutely be banned from the program. [#9]*

Comment: *I do not like any kind of broadcast or aerial application of poisons of any kind. [#15]*

Comment: *EPA would prefer a management plan that avoids the use of aerial or broadcast methods for applying herbicides. However, we understand that there are terrain or weed conditions where aerial or broadcast spraying of powerful herbicides according to the label is the only feasible approach. Accordingly, EPA agrees with alternative R4, but urges Bonneville Power to restrict the use of aerial and broadcast methods in upcoming projects as much as possible so as to avoid deleterious effects on non-target plants and wildlife. [#34]*

Response: Thank you for your comment. Please note that, under Alternative R4, aerial and broadcast herbicide applications would be sparingly used for tall-growing vegetation on the rights-of-way, and somewhat more for noxious weed control. Please see Figure IV-6. Also note that, in the overall management goal of promoting low-growing plant communities, we state that one must be careful not to disturb existing low-growing or non-target plants. Using selective herbicide application techniques or selective herbicide products would be necessary to avoid harm to non-target vegetation.

Comment: *Don't spray any poisons. [#30]*

Response: We assume that by "poison" you mean "Herbicides." Please note that the EPA-approved herbicides we are proposing to use would be applied using protective measures (in planning steps), including requirements listed on the herbicide labels. These measures are important in keeping herbicides where they are needed for treatment and not affecting non-targeted areas (such as water bodies).

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Comment: *While I personally am not too comfortable with aerial spraying, I understand it is least cost, and most effective for you. [#27]*

Comment: *The [Alliance for the Wild Rockies (AWR)], appreciates the opportunity to participate in this planning process and we support the Administration's effort to control vegetation using means which minimize adverse environmental impacts. However, AWR is concerned [with] several of the preferred alternatives, especially the R4/VS3 alternative, would permit Bonneville to utilize broadcast and aerial herbicide treatments, impacting both target and non-target vegetation. ... if (herbicides) are used, under no circumstances should broadcast and aerial methods be employed. [#26]*

Response: Thank you for conveying your concerns. Bonneville would like to have aerial and broadcast herbicide application methods in our vegetation management tool-box. However, we estimate that the number of rights-of-way that would be appropriate for the use of these methods would be limited (please see Figure IV-6.) Also, please note that the planning steps would help determine where these methods might or might not be appropriate for use (e.g., restrictions due to land use or natural resources present). The steps also provide a number of mitigation measures to lessen potential impacts, including ways to limit impacts on non-target species via selective versus non-selective herbicides, wind drift restrictions, observation of no-spray buffer zones, and complying with all label instructions.

One commenter mentioned that aerial application is the least cost method; this would probably be true for densely vegetated rights-of-way, but not be for many other right-of-way circumstances.

Comment: *Also, if wildlife is allowed in the right-of-way, they will help inhibit plant growth to some degree. [#15]*

Response: Yes, studies of rights-of-way on the East Coast have shown that wildlife plays a role in inhibiting tree growth by eating seeds and leaves of young saplings. On some Bonneville right-of-ways, browsing by deer and elk has been noted. However, the browsing is very species-selective, and controls the height of plants only to a limited extent.

Whether wildlife is allowed in the right-of-way depends on the underlying land use and on the presence of barriers associated with that use. Many rights-of-way are open space, and wildlife may come and go independently.

Comment: *If you don't kill the plants but cut and prune you won't have a revegetation question. [#15]*

Response: Pruning tall-growing trees along 15,000 miles of right-of-way is extremely expensive. Repeated pruning would have to be done very frequently. On the west side of the Cascades, some trees can grow 3 to 7 feet in one season (see below for examples of tree growth rates west of the Cascades). Bonneville is proposing that most vegetation in the right-of-way should be low-growing plants that do not threaten electric reliability. Also note that pruning often causes multiple stems to sprout, increasing the amount of vegetation control needed.

Species	Growth rate	
	(feet/year)	(feet/5 years)
Douglas-fir	3 - 6	15 - 30
Western redcedar	1 - 4	4 - 16
Bigleaf maple	5 - 8	20 - 44
Red Alder	3 - 8	12 - 32
Western hemlock	1 - 3	4 - 12

Comment: *Plant trees under the lines that don't grow high. [#30]*

Response: Because, in general, we can't have trees taller than 10 feet high under the line, we want to promote low-growing plants. Those plants can include trees, if they stay short. Unfortunately, there are not many "low-growing" tree species. Private landowners along our lines may obtain special permits from Bonneville to plant trees that are maintained at short heights (Christmas trees, orchards) as long as the trees don't block access to the towers or the roads. For Bonneville to plant low-growing trees, and nurture them until they hold their own would be very expensive. We will and do plant trees in special circumstances.

Public Comments and Responses

Comment: *An individual from the Quinalt Tribe had a comment regarding herbicides as they relate to labor; that local labor should be used to control vegetation in lieu of herbicides. Un- or under-employment was unacceptably high on tribal lands. [#31]*

Comment: *You can improve the choices by employing full-time staff to do vegetation maintenance along rights-of-way. Employ people rather than poison to control plants. [#15]*

Response: Contracts for vegetation removal are often bid on by local people. On Tribal Reservations, Bonneville has often offered contracts to do this work to qualified Tribal members. Regarding using labor instead of herbicides, we've found that the amount of work to control the vegetation in the right-of-way would increase without the use of herbicides (we have seen that through recent years). In the long run, the impacts on the environment also increase because of continual and increased maintenance activities as resprouts grow thicker and thicker.

Please note that Bonneville has 10 full-time staff and many hours of contract staff employed in controlling vegetation.

Right-of-way Vegetation Selection Alternatives

Comment: *I prefer: . . . VS3. . . . You can improve the choices by: eliminating all but . . . VS3. . . . Do not weaken your position or stance by accepting any choice but . . . VS. [#2]*

Comment: *VS3, any vegetation. [#28]*

Comment: *Of the choices offered in the Draft EIS, I prefer any methods that give the biggest amount of tools in the tool box. This appears to be . . . VS3. [#8]*

Response: Thank you for your comments and support.

Comment: *I do not like: Language written under "Alternative VS1-noxious weeds" (p. S-15) that reads "This alternative would allow us to keep in compliance with controlling noxious weed" when the BPA is not currently in compliance with controlling noxious weeds (e.g., on the Kootenai National Forest) (for noxious weeds currently designated by the State of Montana). [#7]*

Response: We've changed the text to more accurately portray the ability to be in compliance. Thanks.

Comment: *I prefer: VS1. [#7]*

Comment: *We support Vegetation Selection VS-1 (herbicides will only be used on noxious weeds). We support the use of alternative methods to control other non-desirable vegetation (other than noxious weeds). [#29]*

Comment: *Of the choices offered in the Draft EIS, I prefer herbicide - spot and localized for noxious weeds only. [#15]*

Response: This alternative would be good for ensuring that Bonneville has feasible tools for helping control noxious weed infestations. However, by limiting herbicide use to noxious weeds and not allowing the treatment of deciduous species, the probability of arriving at low-growing plant communities along the rights-of-way is low. Just as it is difficult to control noxious weeds without the use of herbicides, we have found that it is extremely difficult to control tall-growing species without at least some herbicide use. We are proposing to use an integrated approach—a mix of methods to control tall-growing species that includes the judicious use of herbicides.

Comment: *If herbicides are used, only noxious weeds and deciduous plants that compete with the low growing plants should be targeted. [#26]*

Response: As we've noted in the document, noxious weeds and deciduous plants are both very difficult to control without using herbicides. We are proposing to use herbicides in an integrated approach, for any vegetation depending on the site-specific resources present.

Comment: *Using herbicides on any type of vegetation would likely have adverse environmental impacts and should not be undertaken. In particular, the Administration should not use herbicides on plant species consumed by wildlife. [#26]*

Response: Thank you for conveying your concern. We are proposing to use herbicides on plants that we cannot have growing under our lines, while trying to promote low-growing plants. Please note that most of the herbicides proposed for use on rights-of-way rate *practically non-toxic* to *slightly toxic* to mammals.

Public Comments and Responses

Comment: *EPA can also support alternative VS3 which would allow herbicide use on any vegetation, but urges Bonneville Power to limit application whenever feasible to noxious weeds and deciduous plants and trees capable of re-sprouting. [#34]*

Response: Thank you for your comment.

Electric Yard Alternatives

Comment: *Of the choices offered in the Draft EIS, I prefer any methods that give the biggest amount of tools in the tool box. This appears to be . . . E1. [#8]*

Comment: *E1, selective herbicide. [#28]*

Comment: *In your Electric Yard Program, we support Alternative E1, because it appears that other alternatives (besides E1) pose a direct threat of electrocution to your maintenance workers. [#29]*

Response: Thank you for your comments. Yes, allowing vegetation to sprout within an electric yard poses a threat to those working in the yard. We have not found other feasible ways to keep plants from sprouting within the yard.

Comment: *Electric Yard Program: If ground cloths that help prohibit plant growth can be utilized in these areas it would reduce the need for maintenance as well as the use of pesticides. [#14]*

Response: Ground cloths are not feasible in these areas because of the work and safety issues with replacing them (digging up the gravel in an electrically charged environment). We have removed the mention of this method in Table II-1. We have also added more discussion of this method under our non-electric facility alternatives in Chapter IV. Thank you for bringing this to our attention.

Comment: *Finally, EPA agrees with Bonneville's proposed approaches to managing vegetation at electric yards and non-electric facilities, although Bonneville should attempt to minimize the use of herbicides when implementing these approaches. [#34]*

Response: Thank you for your comments.

Non-electric Alternatives

Comment: *Of the choices offered in the Draft EIS, I prefer any methods that give the biggest amount of tools in the tool box. This appears to be . . . NE1. [#8]*

Response: Thank you for your comments.

Comment: *Non Electric Program: It is preferable that landscaping utilize native plants to reduce the use of pesticides, fertilizers and water resources. Landscaping with native plants is aesthetically pleasing, virtually maintenance free, and requires no fertilizers and less irrigation. [#14]*

Response: Thank you for your comment. Most of Bonneville's landscape vegetation is established. When new plants are needed, we consider native plants and plants that require little maintenance.

Comment: *In your non-electric Program we support Alternative NE1 if the herbicides will only be used on noxious weeds and not to control other undesirable vegetation. It is unclear from the description if this was your intent since it just mentions "weeds" and not "noxious weeds." If the intent is to use herbicides to control any undesirable vegetation, then we support Alternative NE2. [#29]*

Response: Thank you for pointing out the need for clarification. Alternative NE1 would have herbicides available for use for control of any vegetation necessary, not just for noxious weed control. We have clarified this in the text. Given this, we note your support for alternative NE2.

Comment: *Alternative NE2 (S-17) the argument for using herbicides is often related to access and cost effectiveness. Therefore, landscaping at non-electric facilities should be readily able to utilize non-herbicide methods to manage noxious weeds. [#26]*

Response: There are advantages and disadvantages to all the methods. To control noxious weeds, herbicides have advantages of killing roots and being able to treat large infestations. Other "weeds" in landscaping could be treated with herbicides or other methods. We recognize your preference for the use of non-herbicide methods.

Public Comments and Responses

Alternatives Not Considered

Comment: *BPA failed to review the alternative method of running transmission lines underground through specially constructed cooling system thus eliminating the extensive need for vegetation management. [#22]*

Response: Thank you for suggesting other alternatives. However, reconstructing the transmission system is outside the scope of this EIS. Bonneville reviewed reasonable alternatives for vegetation management of our system. We did not review alternative methods of reconstructing the transmission system to avoid the need for vegetation management. Such alternatives do not meet Bonneville's need for "keeping vegetation a safe distance from existing facilities." This alternative is also not reasonable from an economic standpoint because of the billions of dollars it would cost to implement. There would also be great technological hurdles to clear in order to underground Bonneville's transmission system and still meet the needs of our customers. Therefore, we do not deem this a reasonable alternative that this FEIS needs to consider.

Comment: *No discussion about partnerships with public and private industries to utilize transmission rights-of-way for compatible uses that would maintain vegetation at optimum heights. Such actions as the berry industry, pulp and paper industry or Christmas tree farming were not reviewed. [#22]*

Response: Compatible uses under the rights-of-way are part of all the alternatives. About 1,440 miles of our corridors cross agricultural lands. These uses are addressed in the EIS in Chapter V (Affected Environments, Land Uses) and Environmental Consequences (Agriculture). Since Bonneville usually doesn't own the land under the transmission lines, we do not have complete control over the compatible uses. We have a permit process for compatible uses that include orchards and Christmas tree farms. These uses are compatible unless the vegetation is not maintained by the landowner (if trees grow too high or interfere with access to the facilities).

Comment: *Other Alternatives: The DEIS only addresses alternatives that manage vegetation in order to maintain safe operating clearances. The EIS does not address any alternative which manages the transmission facilities in order to maintain safe operating clearances. . . . I think that in some specific instances in which*

raising tower structures, adding new towers, minor route realignments, possibly even managing current loads during periods of high temperature to prevent unsafe line sags could be implemented as a way to allow vegetation to develop naturally and provide critical resource benefits while continuing to transmit electricity safely. This EIS process could address the specific planning steps which would identify specific conditions/locations where managing the transmission facilities rather than the vegetation would be appropriate. Further, site specific analysis would be needed to determine exact locations of new towers, right-of-way clearing, etc. [#36]

Response: Thank you for your thoughtful comment. Bonneville has in the past taken some of the actions you describe, and will probably continue to do so as part of its transmission system maintenance, development, and management activities. However, here we are examining alternatives that meet our need for keeping vegetation a safe distance from existing facilities. Our need is not to re-construct the transmission system to avoid interference from vegetation. Our facilities have already been constructed in a manner that takes into account the geographic features of each right-of-way. The alternatives for our vegetation management program need to be reasonable and effective for all the conditions covered by our 15,000-mile transmission system. As the comment notes, some of the suggested actions—such as raising tower structures, adding new towers, or route realignments—would apply only in some specific instances.

Comments and Responses to *Affected Environment* (Chapter V)

Comment: *Page 119, T&E species are listed by both USFWS and NMFS. [#1]*

Response: True, but plant species are listed only by the USFWS. To avoid this confusion, and for consistency with other sections, we have eliminated the sentence you refer to.

Comment: *Page 118, table V-1 shows white fir in mid elevations of the Blues and North Idaho. This is wrong. White fir occurs in southwestern Oregon. [#1]*

Vegetation

Public Comments and Responses

Response: Thank you for pointing this out. Reviewing *Abies concolor* (white fir) we found that it occurs in the Blues, but not in Northern Idaho. It also occurs in the Cascade range of Southern Oregon, as you stated, and Northern California, with some in Southern Idaho along the Utah border. We have updated the table.

Comment: *The reader is supplied with reasonable maps within the document which show the location of transmission lines, but unless I missed it, there was no text on the mileage of the transmission lines in each of the major ecosystems -- grasslands, shrub, and forest. [#22]*

Response: Thank you. We have added this information in the vegetation section, Chapter V, Affected Environment.

Comment: *Vegetation maps - do they show the vegetation types under all the lines? Portland shows-up as agriculture. [#30]*

Comment: *Figure V-2 Vegetation Type, you are showing light green (majority deciduous) in many places in Eastern Washington and North Idaho. Most are wrong. The major river bottoms are deciduous and the uplands are coniferous. [#1]*

Response: Please note that the vegetation map V-2 is gross in scale and is intended to give the readers a general idea of the distribution and range of vegetation types found throughout the system. At this scale, it is not possible to show deciduous plants in river bottoms in areas of mostly coniferous growth. The maps will not be used for site-specific vegetation identification. Given that, also note that we have made some changes to our maps to try to reflect vegetation types more accurately. Thank you for your observations.

Comment: *Vegetation types need to be revised and possibly expanded. Little mention is made of the shrub-steppe ecosystem although BPA on page 117 wants the reader to consider the shrubland ecosystem as containing the shrub-steppe ecosystem. Shrublands according to BPA can be located in high precipitation areas or low precipitation areas and is also Range Land. This classification is not practical and takes in too many independent ecosystems. I feel that the shrub-steppe ecosystem, a low precipitation ecosystem, warrants its own discussion since according to the maps provided, many miles of transmission lines cross this ecosystem type. Figure V-2, Vegetation*

Types, does not depict the shrubland ecosystem as stated on page 116 of the text. [#22]

Response: Thank you. We have added both discussion about this ecosystem and information to the map.

Comment: *Page 119, Table V-2, see Neitzell 1999. [#22]*

Response: Table V-2 addresses only Federally listed threatened and endangered plants. Thank you for the information on Washington State listed species in the Hanford Reach. We will pass the Neitzel report on to the Natural Resource Specialist who works in the Hanford Reach area.

Comment: *Page 121, last paragraph, "...crosses 10 sole-source..." however there are only 9 listed. [#22]*

Response: The Eastern Snake River Plain aquifer has been added.

Water

Comment: *Page 122, 3rd paragraph, sentence 3, clarify Snake River: "...and flows through Idaho and along the Oregon-Idaho border into Washington,..." [#20]*

Response: Thank you. The description has been clarified.

Comment: *Our Forest [Willamette National Forest] is in the process of completing a new Environmental Assessment for Integrated Weed Management. Many parts of the BPA preferred alternative will dovetail well with the Willamette EA. [#33]*

Response: Thank you for reviewing the EIS. We look forward to working with your Forest on a right-of-way management plan.

Comment: *Page 138, 2nd bullet: add Confederated Tribes of the Umatilla Indian Reservation [#22]*

Response: Thank you, the change has been made.

Land Ownership

Comment: *Page 136 identifies the current BPA facilities covered by direction in the Northwest Forest Plan on the Modoc National Forest.*

Public Comments and Responses

This is not currently the case. All current facilities operated by BPA under agreements with the Modoc National Forest are outside the area of the Northwest Forest Plan. [#32]

Response: Thank you for your observation. We have changed the document accordingly.

Cultural Resources

Comment: *Page 139; see Neitzel 1999 [#22]*

Response: See 22-14. Thank you for the information on the abundant cultural resources in Hanford Reach. We will forward this information to the Natural Resource Specialist who works on our facilities in your area.

Comments and responses to *Environmental Consequences* (Chapter VI)

General

Comment: *In addition to previously utilized chemical control agents for the program, the current document now proposes the use of a total of 24 herbicidal compounds singly and in combination. While we applaud the document for not suggesting solely the use of toxic herbicides, the Department has concerns over the effects that several of the herbicides may have on non-target species, particularly endangered, threatened, and proposed species. [#40]*

Response: Thank you for acknowledging that we are not proposing solely herbicides with high toxicity ratings. Please also note that, in response to comments we received on the draft EIS, we have dropped from our list some herbicides that had high toxicity ratings for aquatic species.

Vegetation

Comment: *We feel that the environmental risks of aerial application of herbicides to non-target species are unacceptable. [#29]*

Response: Thank you for your comment. Please note that, although the aerial spraying application *technique* is non-selective in the plant types treated, the herbicide *formulation* (chemical make-up) can be selective such that only the target vegetation will be controlled. For example, if a right-of-way is filled with conifer saplings, the herbicide

formulation could be one that primarily affects targeted conifers (not broadleaf) plant species.

Comment: *The BPA EIS did a fairly good job in presenting the case but . . . it appears that they have not given the shrub-steppe ecosystem much attention during their analysis but instead dwell mainly on forest system. . . . The reader is at a loss as to what BPA will do where transmission lines cross shrubland ecosystems. If no vegetation management will be done in these ecosystems it should be mentioned in the document. [#22]*

Response: The biggest potential for impact occurs when rights-of-way cross forests. Because the most intensive vegetation control needs to take place in those areas, much of the EIS is focused on determining the potential impacts and ways to avoid impacts in forest ecosystems. There is some vegetation control needed in shrublands (e.g., clearing sagebrush around poles for fire control, controlling tall junipers). Thank you for noting this lack. We have added discussion in the Chapter VI regarding potential impacts in shrubland.

Comment: *Page 162, the buffer widths for NRCS code 391A are national standards used in a general scope. Most States have supplemented this standard to fit their conditions and situations. There can be many widths depending on the circumstances. You should contact each state to obtain the state supplement to the national standard. [#1]*

Comment: *Rashin's 1992 study on aerial application of pesticides showed that pesticides were detected in streams following application on all the study sites monitored, thus being out of compliance with label requirements. The study recommended that a 90-meter buffer be applied along flowing streams. Manual and mechanical applications typically are at higher concentrations and droplet size of drift is also larger. . . . If pesticides are applied we recommend that a minimum 250 foot buffer be applied along all streams and wetlands and that drift into buffer areas be prohibited. [#14]*

Comment: *Page 62 and Page 161. It's somewhat unclear exactly what these riparian zones apply to. It appears to be a mix of different standards, some are BPA, some are BLM and others are NRCS. The Northwest Forest Plan buffers are only displayed in Appendix F. Perhaps it would be better to state that these are examples of potential*

Water

Public Comments and Responses

riparian zones but that site specific locations and management plans will dictate the actual distances. Restrictions on buffer distances may also be applied as a result of consultation for listed fish species under the Endangered Species Act. [#33]

Comment: *Riparian Protection: 1) Table III-1 Riparian Buffer Zones (page 62) needs to be thoroughly reviewed by fisheries biologist to ensure INFISH standards are being met with the proposed buffer zones. [#36]*

Comment: *We recommend that site-specific planning include a detailed examination of the environmental fate and effects of proposed formulated herbicide products such that more restrictive riparian buffer and herbicide-free zones may be used when necessary to protect natural resources, particularly endangered and threatened species, other wildlife, fish and aquatic organisms, and water. [#40]*

Response: Thank you for your comments. When developing the appropriate buffers for our proposed methods (including herbicide use), Bonneville reviewed and considered numerous standards at the national, state, and local level. Rather than list all the local buffer requirements (which are subject to change) in this EIS, we have established buffers that are appropriate for our facilities and methods. Our proposed buffers—which have been revised from the draft EIS to include the aquatic toxicity rating for buffer width consideration—are in place for our managers to follow when there are no other buffer requirements in the area. If different requirements are in a given area (e.g., T&E fish species may require a different buffer), Bonneville will use the local buffer widths **if** they are more strict than Bonneville's. We will not use more lenient buffer widths.

Please note that the references in the table (e.g., NRCS code 391A) are given to show where our buffers are consistent with other established standards.

Comment: *These applications (aerial application of pesticides) need careful monitoring to ensure that herbicides are not entering buffer areas and water. [#14]*

Response: Monitoring would depend on a site-specific instance of aerial application. Bonneville may initiate monitoring to determine application effectiveness and/or resource protection purposes. Monitoring may also be required at the request of regulatory agencies such as NMFS.

Comment: *Stream and wetland buffers provide many functions and by allowing herbicides to enter these protected areas certain functions are lost. [#14]*

Comment: *The site-specific planning steps for water resources state that "if using herbicides, it may be necessary to leave untreated zones (filter strips) to preclude the possibility of herbicide movement from the application site to adjoining water bodies." The [Oregon Department of Fish and Wildlife] requests that BPA always apply this mitigation measure near adjoining water bodies. [#21]*

Response: Bonneville will always consider appropriate buffers for herbicide use near water bodies to ensure that herbicide doesn't get into the water body and to protect important riparian habitat. In many cases, that will mean untreated zones near water bodies. However, in some instances, either noxious weeds or fast growing deciduous trees may grow immediately adjacent to streams and other water bodies. It may be necessary to treat noxious weeds (in accordance with local noxious weed authorities) and/or treat fast growing deciduous trees where transmission lines are directly threatened in riparian zones. In these situations, we will use chemicals with low aquatic toxicity ratings and low persistence combined with the least invasive application methods, such as spot treatments (basal and stump and/or injections). Bonneville will coordinate such activities with regulating authorities, where applicable.

Comment: *. . . increases in water temperature as vegetation is removed, etc. [from herbicides] [#26]*

Response: If vegetation is removed from stream banks *by any means or methods*, there is a potential for increase in water temperature. We have a mitigation measure in place for water resources to "leave streamside vegetation intact where possible" to help mitigate potential streamside vegetation removal impacts.

Comment: *Riparian Protection: 3) The study cited on page 167 has been taken completely out of geographical context. The climate, soils, vegetation are all completely different between New York and the Pacific Northwest. Surely there is a study applicable to the Pacific*

Public Comments and Responses

and Inland Northwest that discusses the impacts of removing overstory along stream reaches. [#36]

Response: Extensive studies have been carried out on the East Coast on the impacts of utility rights-of-way across a variety of landscapes. We have not found any rights-of-way studies in the Northwest for stream crossings (most of the studies conducted in this area are of the impacts of clear-cuts on stream temperatures, not of small lengths of clearing). We acknowledge that there are definite differences between climate, vegetation, and soils from what we find here in the Pacific Northwest. However, there are still some things we can learn from these studies. Please note that we did not rely on this information to draw definite conclusions about impacts that would be observed here.

Comment: *All of the pesticides listed in the BPA proposal are restricted for use in or near water and/or wetlands. [#14]*

Response: The herbicides listed in the EIS are all registered for "terrestrial use only" with one exception: glyphosate. Glyphosate is registered for use on land or water. However, in most states a special permit is required in order to apply herbicides in water; such an herbicide is usually used for special lake plant infestations or ditch vegetation removal. Bonneville is not proposing use of any herbicides in water. Where Bonneville needs to use herbicides *near* water, all appropriate label instructions and restrictions will be applied in order to protect both surface and groundwater resources.

Comment: *Also, any application around water bodies should be done with the utmost care, especially when using products such as benefin, pendimethalin and trifluralin which are highly toxic to numerous aquatic species. We would advise the maximization of buffer and herbicide-free zones when applying all compounds but especially when highly toxic compounds would be applied around water. [#40]*

Response: We agree that water bodies need special consideration. Please note that Bonneville has dropped some herbicides (the three named above) with high toxicity ratings to aquatic species from the list proposed in the draft EIS. We have also added the consideration of toxicity to the buffer zones to maximize protection of these resources.

Fish and Other Aquatic Species

Comment: *The Draft EIS is lacking an analysis of the Threatened and Endangered Species. Particularly the effect of applying herbicides along stream banks where salmon spawn in cool water and are protected by riparian vegetation. [#6]*

Response: Bonneville will depend on outcomes of a biological assessment/consultation process with NMFS and USFWS for appropriate measures for T&E fish species protection. We are currently in the process of a program-wide consultation, the results of which will be incorporated into our vegetation management program.

Comment: *Riparian Protection: 4) Mitigation Measures, states "Apply all appropriate mitigation measures for water bodies". These "appropriate mitigation measures" should be referenced or stated as there is no way of knowing what these measures are. [#36]*

Response: Thank you for alerting us to this. The statement you are referring to was in the Fish section on mitigation measures. The measures referenced for water bodies are listed in the Water section of Chapter VI. Many mitigation measures apply to both resources. We have added a reference indicating where this information can be found.

Comment: *The Squaxin Island Tribe appreciates the opportunity to review and comment on BPA's Vegetation Management Program. As land and fisheries managers we are currently faced with many controversial issues. Several issues of concern include salmonid health, the preservation of fish habitat and water quantity and quality. . . . All pesticides toxic to aquatic life and subject to soil leaching should be prohibited from further use. These chemicals include but are not limited to: triclopyr, trifluralin, pendimethalin, dimethylamine (2,4D), benefin, bromacil, halosulfuron-methyl, hexazinone, and picloram. [#14]*

Comment: *When selecting a particular herbicide, consider using newer products, which often pose lower risks. [#34]*

Comment: *The [Oregon Department of Fish and Wildlife] appreciates the opportunity to comment on [the DEIS]. The Department's comments pertain to the vegetation management in right-of-way, rather than electric yards and non-electric facilities. The Department generally support's BPA's proposed mitigation measures to reduce the impacts on fish, wildlife and their habitat.*

Public Comments and Responses

However, the Department would request that BPA consider the following changes or additions to those mitigation measures. First, the Department strongly supports the use of riparian buffer zones and herbicide-free zones described in Tables VI-2 and VI-3. However, due to their high toxicity, the Department requests that BPA refrain from using the following herbicides within 30.5 m (100 ft) of waterways, regardless of the application method: 2, 4-D (highly toxic to aquatic organisms in some formulations); Benefin (highly toxic to aquatic organisms); Diuron (highly toxic to aquatic invertebrates); Pendimethalin (highly toxic to aquatic organisms); and Trifluralin (very highly toxic to aquatic organisms). [#21]

Response: Bonneville has looked carefully at the risks posed by using herbicides. Some of the herbicides that are included in our list are newer products that have lower risks (chorsulfuron, fosamine, metsulfuron, and sulfometuron). As part of this EIS, Bonneville has chosen to prohibit the use of certain herbicides having longstanding health or environmental issues. Prohibited herbicides include: atrazine, prometon, simazine. We have further dropped from our list and will prohibit the use of three herbicides that were in the draft EIS: pendimethalin, benefin, trifluralin. Herbicides selected for use within the programs covered in this EIS will be carefully used following the instructions and restrictions EPA has required the manufacturers to place on their labels.

In addition, Bonneville has many Best Management Practices in place, developed as a result of this EIS, to further reduce potential impacts that may be caused by the use of herbicides. These include our riparian zone buffers and pesticide-free zones. We have updated our herbicide buffer widths to include the consideration of aquatic toxicities and ground water or surface water advisories, as well as other mitigation measures resulting from consultations with Tribes and other state and federal agencies when vegetation management affects Tribal lands or other resource issues such as threatened or endangered species.

Comment: *In light of the Endangered Species Act and the numerous proposed listings for wildlife and salmonid species, it has become essential for managers to lessen the environmental impacts of their activities. [#14]*

Response: We agree and hope that the planning steps will ensure that the environmental resources are considered when making decisions for appropriate methods of vegetation control.

Comment: *Several of the pesticides are toxic to fish and have the potential to cause ground water contamination. [#14]*

Response: Bonneville is highly sensitive to the protection of all aquatic species. Generally, EPA requires manufacturers to place a warning on herbicide labels in cases where toxicity to fish is an issue. Based on your comment and others, Bonneville has taken steps to identify those herbicides having aquatic toxicity issues and has either prohibited or restricted their proposed use near water or riparian areas (please see updates to the herbicide buffer zones). EPA has also required manufacturers to place a warning on the label in cases where leaching or runoff may be an issue.

Comment: *Fish and animals need protection against herbicides. [#30]*

Response: Thank you for voicing your concerns. Mitigation measures are in place to keep herbicides from getting into water bodies. Please note that of the 23 herbicides we are considering for use 21 are rated either *practically non-toxic* to *slightly toxic* to mammals, with two rating *moderately toxic* to mammals. Buffer zones will be provided to protect fish and water resources.

Comment: *Use of Herbicides: 2) The BPA DEIS seems to have a fairly subjective tone making assertions that herbicides are not harmful, yet the DEIS does not cite references to fully support this position. For example, on page 168, the DEIS states "There is little potential for fish to be exposed to herbicides: mitigation measures . . . only a relatively small amount of area would be treated within a landscape." The DEIS does not state the effectiveness of the mitigation measures nor does it cite research work that confirms this assertion. [#36]*

Response: We realize that herbicides, if not used properly, can cause impacts. We have analyzed all the herbicides that we are proposing for use, and developed buffers and mitigation measures to be followed. With these measures in place, risks of impacts are greatly reduced. The citations for research for the effectiveness of the measures are footnoted in the buffer and toxicology tables. All herbicide references can be found in the **References** chapter.

Public Comments and Responses

Comment: *Use of Herbicides: The DEIS also makes some contradictory statements. For example, on page 168, the DEIS states that "many of the herbicides proposed by Bonneville are low in toxicity to fish", yet in Table VI-6 (page 175) 11 of the 24 herbicides are listed as moderately to highly toxic to aquatic resources. In addition, two of the herbicides listed in this table do not have any aquatic toxicity data. Eleven of 24, possibly 13 of 24 herbicides being moderately to highly toxic does not match the assertion on page 168 that many of the herbicides are low in toxicity. [#36]*

Response: Bonneville assumptions were based on the fact that some herbicides would only be used in substation environments, while others would be only used along rights-of-way. The final EIS clarifies which herbicides would be used for each facility type. Also, please note that we have dropped some herbicides from the list of herbicides proposed in the draft EIS —benifin, pendemethalin, and trifluralin (all had high aquatic toxicity ratings) and have completed all toxicity data in the tables.

Wildlife

Comment: *I did not find in the text of the document any discussions on State Sensitive Species, nor did I locate any information on the Migratory Bird Treaty Act. [#22]*

Response: Thank you for catching these omissions. We have incorporated state sensitive species into several chapters throughout the final EIS, and we have added a discussion of the Migratory Bird Treaty Act in "Other Requirements" at the end of Chapter III.

Comment: *Finally, the Department requests that BPA consider timing restrictions to reduce impacts on wildlife species in addition to federally listed threatened and endangered species. The state of Oregon has listed several species as threatened or endangered that have not been listed by the federal government. These species include the Arctic Peregrine Falcon (*Falco peregrinus tundrius*), the Kit Fox (*Vulpes macrotis*) and the Wolverine (*Gulo gulo*). The Department has also listed numerous species as "sensitive". Prior to significant vegetation management activities, BPA should contact local Department biologists to discuss timing such activities to avoid unnecessarily impacting these species. [#21]*

Response: Thank you. We have added a discussion of state-sensitive species to the text and a mitigation measure for site-specific vegetation management to contact the state fish and wildlife departments to determine whether there is a potential for impacts on state-listed species and, if so, measures to avoid impacts.

Comment: *Herbicide Use - the DEIS states that wildlife would not be impacted by herbicide use. Since the direct impacts associated with herbicides are at best uncertain, and will vary depending upon the chemical agent, this statement does not seem well founded. [#26]*

Response: The EIS states that the potential for wildlife to be affected by herbicides is based on whether an animal is exposed, whether the exposure amount is enough to cause effects, and what the toxicity of the herbicide is to the animal. All but two of the herbicides on our list are rated *practically non-toxic* to *slightly toxic* to mammals and avians. Of the two that are rated moderately toxic to mammals or avians, one would be used mostly in electrical yards and the other for landscaping and workyards where there is little wildlife. There is potential for impact on non-target resources with our program; we have worked to limit that potential.

Comment: *The vegetation management plan for rights-of-way should consider corridors and their impacts on particular wildlife species in more detail. [#26]*

Response: Detailed discussion of potential impacts on particular wildlife species is not relevant at this level of analysis. It would not be feasible to analyze all the impacts of such a large and diverse area in this document. The planning steps developed in this EIS are to ensure that site-specific impacts are considered when actual projects are to take place.

Comment: *Although the Administration wants the longest possible maintenance free period, shorter period should be considered if impacts to threatened and endangered species are possible. [#26]*

Response: We agree. Bonneville will take appropriate measures for T&E species, if they are present.

Public Comments and Responses

Comment: *Furthermore, herbicide use may include the removal of vegetation upon which wildlife species rely . . . [#26]*

Response: Bonneville needs to remove some vegetation in the right-of-way. We hope to promote low-growing plants, many of which wildlife species use. The use of any method of vegetation control that is non-selective can unnecessarily remove non-target vegetation. Some herbicides and herbicide application techniques can affect non-target species; many do not. The concept being proposed is to use methods that will support low-growing plant communities, which we believe will not only be more efficient for Bonneville, but will increase wildlife habitat along the right-of-way.

Comment: *Listed species: Washington Cascades Only: The western portion of the Cascade Mountains in the State of Washington are associated with federally listed and proposed threatened and endangered species under the Endangered Species Act (ESA). Of the species that may be impacted by the program, the bald eagle, the spotted owl, the marbled murrelet, and bull trout are of particular concern. Not only are direct, indirect, and cumulative effects of concern, but secondary poisoning is also an issue that will need to be addressed when considering the use of chemical control methods around habitats that contain higher trophic level organisms. . . .*

Due to the aforementioned concerns, information provided in the proposed integrated approach, especially the chemical control methods, may have adverse impacts and may have effects on listed species. [#40]

Response: Thank you for voicing your concerns. Secondary poisoning by herbicides is also called bioaccumulation. Bioaccumulation can occur when there is a potential for some animals, such as rodents, to accumulate chemicals in their system; predators who eat the rodent may then be poisoned. We have added information to the document on the potential of the various proposed herbicides to bioaccumulate. Consultation on these species regarding herbicide use will provide appropriate measures to address potential impacts.

Your comments, as well as others received on the draft EIS, have helped us further develop our program to lessen potential impacts (e.g., dropping some herbicides from our proposed list, including toxicity ratings for buffer zone considerations, ensuring the USFWS is in the loop for approving new techniques as appropriate). We are proposing

using the planning steps for site-specific projects so that good decisions can be made to control vegetation, with limited impacts.

Comment: *Temporal issues are also of concern. The time of year chemical control agents are used is critical and should not coincide with such activities as bald eagle and marbled murrelet nesting as well as bull trout spawning and incubation. [#40]*

Response: We agree that timing of vegetation management activities (by any means) can potentially affect some species. Site-specific or programmatic consultations will provide appropriate measures to ensure that timing is considered so that the activities will not coincide with critical T&E species activities.

Comment: *Also, low level aerial applications of herbicides may cause disturbances to threatened and endangered species. [#40]*

Response: We agree that noise of aerial applications could disturb threatened and endangered species. Site-specific analysis and consultations (if appropriate) should ensure that harmful noise disturbance of T&E species does not occur.

Comment: *The document refers to herbicides simply in terms of "active ingredient". Several of the compounds listed in the program have different formulations such as glyphosate and triclopyr. The different formulations contain different amounts of active ingredient, different inert compounds, and different adjuvants all of which determine the fate and effects in the environment, thus making it difficult to assess the potential toxicity to our trust resources. . . .*

Chapter IV [VI] also discusses toxicity as one factor that determines if an herbicide will cause adverse effects to fish or other aquatic resources. In addition, differential toxicity among herbicides is described and BPA states that using less toxic herbicides "in the vicinity of fish-bearing lakes or ponds would reduce the potential for adverse effects." The [USFWS] agrees with this assessment, however we recommend that evaluation of the toxicity of formulated herbicide products (not active ingredients) be included in site-specific planning, perhaps under Planning Step 4. . . .

Public Comments and Responses

... general riparian buffer and herbicide-free zones are presented as mitigation measures to reduce potential contamination of water resources. As discussed in Chapter VI of the DEIS, the physical properties of herbicides partly determine environmental fate. ... The DEIS does not specify which formulated herbicide products will be used in vegetation management, so the [USFWS] cannot comment on potential adverse effects. [#40]

Response: Bonneville recognized early in the preparation of the EIS that different formulations of the same active ingredient might increase *or* decrease the actual toxicity of the product. We chose not to list all the toxicities for all the different formulations because the list would be large and cumbersome, and because we want our mitigation measures and guidance to be based on herbicide *characteristics* rather than on specific formulations. Instead, we chose to use a worst-case assessment in reporting the human and ecological toxicities. That is: when all of the toxicological values for a specific active ingredient were compared against the different formulations of that active ingredient, Bonneville always used the most toxic value. That way, Bonneville believes the relative toxicity may be less but never more than that listed in our tables.

We have also reviewed the toxicological data for inert ingredients and adjuvants. The inert ingredients of the herbicide formulations considered in this EIS are not classified by the USEPA as inert ingredients of toxicological concerns to humans or the environment. Information on inerts and adjuvants has been incorporated into Chapter VI of the final EIS.

Comment: *The [USFWS] requests that BPA limit use of the following herbicides due to the lack of data on the toxicity to fish and/or wildlife: Halosulfuron-Methyl; Imazapyr; and Sulfometuron-Methyl. [#21]*

Response: Those chemicals lacking toxicity data in the draft EIS have been researched; the information has been incorporated into this final EIS, please see Table VI-6.

Comment: *... the EIS discusses feathering. However, inadequate analysis is presented as to edge effects, how to minimize such effects, impacts on interior forest. [#26]*

Response: Chapter VI, Environmental Consequences, Wildlife section, discusses both the potential positive and negative edge effects. This impact is also discussed in NEPA documents when we are considering new transmission line routes. It is more of an impact resulting from constructing a new line across a forest, than of keeping an existing line maintained.

Comment: *Impacts from other [non-herbicide] methods can be mitigated in various ways (e.g., noise disturbance to T&E wildlife can be timed to avoid their nesting and denning periods). [#29]*

Response: We agree that many of the *short-term* impacts of manual and mechanical methods can be lessened or eliminated with appropriate mitigation measures. However, the greater impacts of using these methods alone are in the *long term* when vegetation resprouts. When cut, deciduous vegetation resprouts with an increased number of stems. This creates more thickly vegetated rights-of-way that need to be managed even more intensively. The rights-of-way then need more extensive clearing, and more vegetation per acre needs to be cut with each successive maintenance cycle. When densely vegetated areas are cleared, environmental impacts are more drastic compared to the selective removal of trees or brush. More habitat is affected, more soil is disturbed, non-target plants that have grown in shade-tolerant situations are suddenly exposed, human presence on the right-of-way is increased, and visual impacts are more sudden and dramatic.

Comment: *It is our understanding that the current authorizations and agreements between Bonneville Power Administration and the Modoc National Forest continue to be in effect. The process outlined in the DEIS is not consistent with these agreements. Until such time as [Bonneville] completes the processes necessary to formally transfer land management responsibilities from the USDA Forest Service to the US Department of Energy for the right-of-way, the approving and deciding official for site-specific projects, which may affect the environment, remains the appropriate Forest Service line officer. [#30]*

Comment: *Vegetation Selection: As stated above, the Forest is very supportive of vegetation treatments with herbicides for noxious weeds (VS1). If deciduous species need to be treated on Willamette NF land*

FS- and BLM- Managed Lands

Public Comments and Responses

(VS2 or VS3), additional NEPA analysis will need to occur because the 1999 forest-wide Integrated Weed Management EA covers herbicide use on only newly invading weed species. [# 33]

Comment: *NEPA Responsibility: On page 185, BPA makes the statement that "the decisions on vegetation management of rights-of-way across USFS and BLM managed lands are Bonneville's and therefore Bonneville is responsible for complying with NEPA." And goes on to state "The USFS and BLM usually would not have a decision to make (that would trigger their NEPA process) unless the proposed vegetation management were not consistent with their existing plans and regulations." The Memorandum of Understanding between BPA and USFS dated 1974 (FSM 1531.73a) provides for BPA's occupancy and use of National Forest lands consistent with laws applicable to the management of National Forest System in Item 1. Also, Item 6 provides for a subsidiary MOU to implement the master agreement. In the Subsidiary Memorandum of Understanding dated 1974 (FSM 1531.72a, FSM 8/83 R-1 Supp 41) Section 1B. Environmental Analyses and Environmental Impact Statements states that "Bonneville and the Forest Service will conduct environmental analyses and prepare environmental impact statements in accordance with their individual procedures". It also states that "When an environmental statement is to be prepared, the agency initiating the proposal will take the lead in statement preparation. The other agency will actively participate in development of the statement by (1) providing...existing information...and (2) review and comment on the draft and final environmental statement." Thus, the wording in the DEIS is not entirely correct and could mislead agency as well as public individuals as to whose responsibility the decision making really is. As I see it the FS has only granted BPA the occupancy and use of National Forest lands not the ownership nor management responsibility of these lands, in addition, the FS and BPA have agreed that environmental assessments will be conducted in accordance with their individual procedures. This section (page 185) should be rewritten in order to clarify BPA's role as they it crosses National Forest lands. The existing MOU's provide a lot of direction regarding roles of the various agencies. [#36]*

Response: Thank you for your comments and noting the need for clarity. We have updated the statement in the EIS as follows:

“Bonneville, the FS, and the BLM all have decisions to make regarding vegetation management of rights of way across National Forest or Management Areas. Typically, as the owner

and operator of the transmission facility, Bonneville will propose the vegetation management action. Under NEPA regulations and agreements between the agencies, this means Bonneville will usually have primary responsibility for completing the environmental impact analysis needed. Each agency will then use this analysis in its own NEPA compliance process and base its decisions upon it. Bonneville's decision will most often be on how to manage vegetation on a right-of-way. The Forest Service or BLM will decide whether Bonneville's proposed action triggers their need for NEPA, and if so, whether the action is consistent with their Forest or Management Area plans."

Bonneville recognizes that if we propose an action on Forest Service lands that is not consistent with the Forest plans and prior decisions, new Forest Service decisions may need to be made. These decisions would require NEPA analysis consistent with Forest Service regulations.

Please note that Bonneville is preparing this EIS to provide the NEPA coverage needed to control vegetation at its facilities across our service territory, including on National Forest and BLM lands. As a cooperating agency on the EIS, the Forest Service can adopt the EIS and issue its own Record of Decision to allow it to approve a Bonneville proposal to control vegetation. If Bonneville adopts one of the action alternatives, then the following process would apply to Bonneville rights-of-way and electrical facilities on National Forest lands. (As a cooperating agency, the BLM is proposing to adopt this EIS and issue a ROD.)

For site-specific vegetation management projects, we are proposing to prepare a Supplement Analysis. This is our equivalent to the Forest Service's Interdisciplinary Review. Bonneville would work with the checklist referenced in Chapter III of the EIS to study the site-specific impacts of the management regime proposed. This would include, for instance, consultation with the USFWS regarding T&E species, public comment, and consultation with the Forest Service. If the impacts of the site-specific action were no more than what Bonneville anticipated in the EIS, then Bonneville could conclude its NEPA compliance for the project with the Supplement Analysis. If the Supplement Analysis showed the impacts would be greater or other than those examined in the EIS, then Bonneville would supplement the EIS. Because the Forest Service is a cooperating agency on the EIS, it could adopt the EIS, issue a ROD after completing its public process, and approve

Public Comments and Responses

Bonneville's proposed action described in the Supplement Analysis/supplemental EIS.

Other Federal Agencies

Comment: *Page 187, 5th bullet: To what degree has the notification [of other Federal agencies] been done? It appears that it was not done for Hanford, unless receiving the draft was the extent of the notification. [#22]*

Response: The bullet referred to is when site-specific vegetation control is needed. However, notification and request for comments on this Program-wide EIS was done through letters requesting input for scoping the program, a follow-up Fact Sheet explaining what we heard during scoping, and the draft EIS for comment. Hanford has been on our mailing list to receive all mailings regarding this EIS process.

Tribal Lands

Comment: *Several commentors stated that trust needs to be built between Bonneville and the Tribes for planning and implementing programs. Firmly established mutual trust would provide long-term relations between the Tribes and Bonneville. [#31]*

Response: We agree, and hope that by including input from the Tribes in our overall program, and working together on individual projects, trust and long-term relationships can be built. Thank you for voicing this aspect of working together.

Cultural and Historic Resources

Comment: *As a traditional weaver and teacher I would oppose to the use of any herbicides because of not knowing the effect on plants, animals, water, roots, and materials used for weaving. [#12]*

Response: Thank you for your comment. We have added a measure to the planning steps in the Cultural Resources section to notify Tribes with traditional-use areas in the project area to help determine if there are any traditional-use plants that need to be considered when determining vegetation control.

Also, please note that Bonneville would apply herbicides to target plants and limit effects to non-target vegetation as much as possible. To protect human health, Bonneville would follow label instructions requiring an interval of time to go by before using the application area or vegetation within that area.

**Public Health
and Safety**

Comment: *Page 195, 6th paragraph, 2nd sentence: at the end of the sentence add "or exposure to downwind draft". [#22]*

Response: The addition has been made; thank you.

Comment: *I was quite distressed upon reading your "transmission system vegetation management program." I am appalled that you are proposing (and probably already using) herbicides with a toxicity category II, III, and IV! [#9]*

Response: Thank you for conveying your concerns. Please note that toxicity categories are defined and used by EPA in describing the acute toxicities of herbicides relative to human receptors. These toxicity ratings are used by EPA to determine label requirements and warnings (such as establishing personal protective apparel for applicators, reentry intervals after application and other warnings) for the specific formulations. Categories range from Category I (Highly Toxic) to Category IV (Practically Non-Toxic). As listed on Table VI-7 of the EIS, most of the herbicides proposed for use by Bonneville fall in the Category III (slightly toxic) and Category IV (practically non-toxic) range. The Herbicide Fact Sheets, Appendix H of this document, contain the source material for the information presented in the tables.

Comment: *These same herbicides are carcinogenic, teratogenic, mutagenic, and effect reproduction. (2,4-D is notorious for causing problems.) [#9]*

Response: The effects you are describing are chronic toxicity effects. Chronic toxicity is the amount of a pesticide that will cause injury during repeated exposure over a period of time. Bonneville has listed chronic effects such as carcinogenicity, teratogenicity, etc., on Table VI-7 of the EIS. Most of the chemicals showed no adverse effects or some effects at doses higher than the "no observable effect level" (NOEL). In the event a chemical has such effect at or below the NOEL, EPA requires a chronic toxicity warning to be placed on the label along with appropriate precautions and mitigation measures. None of the herbicides being proposed for use in our program (including 2,4-D) have chronic toxicity concerns requiring such labeling.

Public Comments and Responses

Comment: *And you are actually proposing to use aerial spraying of some of these toxic chemicals? [#9]*

Response: Yes, we are proposing limited aerial spraying. Only some herbicides are registered for aerial applications. The herbicides on our list that could be used for aerial applications are imazapyr and metsulfuron, which have relatively low toxicity ratings. Also, the planning steps will insure that the land uses and the natural resources present are considered when determining whether aerial spraying is an appropriate method for use.

Comment: *Herbicide treatments have caused historic and repeated problems at numerous junctures, including manufacturing, transport, storage, application, dispersal, transformation into other toxic chemicals and disposal. [#26]*

Response: Thank you for voicing your concerns. The EIS addresses logistical, application, safety, and health risks of using herbicides. These issues have also been studied at length by the Environmental Protection Agency (EPA) and the Federal Occupational, Safety and Health Administration (OSHA), resulting in label requirements, and Material Safety Data Sheets (MSDS) to reduce risks. Bonneville understands that such risks can never be completely eliminated, but knows that risks are minimized greatly by complying with federal requirements for herbicide use, providing Annual Herbicide Certification for employees, and providing additional mitigation measures for herbicide use. Please also see other responses to comments on herbicides.

Comment: *In addition, the direct effects of numerous herbicides are being found to affect the endocrine systems of both wildlife and humans. This can compromise development, reproduction, behavior, sexual integrity, and immune and nervous system functioning. [#26]*

Response: Thank you for your comments. We have reviewed all the herbicides we are proposing for use, and none of them are endocrine disruptors (they do not affect the endocrine system). One herbicide (triflurilin) that was in our draft EIS has potential effects on the endocrine system, but we have dropped that herbicide from our list.

Comment: *Projects should avoid to the extent feasible certain ingredients which are broad-spectrum and/or persistent and/or appear to affect non-target species. Of particular concern are bromacil, 2,4-D, dichlobenil, oryzalin, pendamethalin, triclopyr, and trifluralin. EPA is reassessing these ingredients for future use under the Food Quality Protection Act of 1996 which requires the Agency to consider all non-occupational avenues of exposure in its risk assessment. [#34]*

Response: Please note that our proposed use of broad-spectrum herbicides is limited to places where total vegetation control is necessary (electric yards, around wood-pole towers for fire protections, and in maintenance work yards). With respect to human health and environmental issues, Bonneville has assessed the available information for the herbicidal chemicals we intend to use as a result of this EIS. We believe that since we are prohibiting certain herbicides from use (e.g., pendimethalin and trifluralin), and restricting the use of other certain herbicides (using stricter buffer zones for herbicides with moderate and high toxicity ratings such as formulations of 2,4-D, dichlobenil, oryzalin, and formulations of trifluralin), Bonneville has reduced the risk of using herbicides as much as practical. We will keep current on studies of herbicides and include new information in our program as appropriate.

Comment: *"Integrated Vegetation Management is a strategy to cost-effective control vegetation with the most benign overall long-term EFFECT ON PUBLIC HEALTH AND SAFETY AND THE ECOSYSTEM. . . . I was told by my mother that it is important to protect everything in our circle of life because one thing depends upon the other, everything on this earth has a purpose. . . . I think that it is very important for the agencies to deal with the methods appropriately and with respect not only for Mother Earth but also the people. I would like to be informed of any hearings that will be held in the Aberdeen area so that I can attend. [#12]*

Response: Thank you for your perspective. We hope that with the planning steps in place for determining the specific circumstances at any given area needing vegetation control, Bonneville will be able to make wise decisions for the appropriate use of methods and mitigation measures in an integrated approach. As we indicated in an e-mail to you, we did not conduct any public meetings in the Aberdeen area, but would have been happy to schedule one with you if you have a group that would like to meet.

Cumulative Impacts

Comment: *As a government agency, you should be protecting us. Those of us who live in Skamania County are already bombarded by pesticides from the county, the state, Southwest Washington Health District, PUD, the railroad, gas lines, plus what private citizens spray. You are not the only ones using pesticides. Please keep that in mind. Of course I understand the need to keep down vegetation but you have better, safer means. . . . You must consider the health of the entire ecosystem, of which we are a part. . . . Finally, the cumulative effect of herbicide applications are difficult to quantify and are not adequately understood. [#9]*

Response: Thank you for voicing your concerns. Bonneville has considered the potential cumulative impacts of our vegetation management program when added to other past and present actions by other parties (see Chapter VI Cumulative Impacts). With this in mind, we have worked to develop a proposal to keep our system reliable while minimizing impacts. We think that promoting low-growing plants (with the integrated use of some herbicide) will lessen overall environmental impacts.

Comment: *An individual from the Confederated Tribes of the Warm Springs Indian Reservation had concerns that Bonneville had incessant intrusions upon the reservation lands; the cumulative effects of all activities was disruptive to their lifestyle and may negatively impact the cultural value of tribal lands. [#31]*

Response: Thank you for voicing your concerns. We hope that engaging the Tribes in the planning processes for managing our facilities that cross your Reservation will address Tribal concerns and issues and help alleviate overall negative impacts. Chapter III (Planning Steps, 2. Identify Surrounding Land Use and Landowners/Managers) has steps for working on Tribal Reservations.

Comments and Responses to *Agencies, Organizations, and Individuals to Whom the EIS is Sent*

Comment: *Page 235, Benewah County should receive a copy. (Idaho) [#1]*

Comment: *State Historic Preservation Offices [SHPOs] need to be on mailing lists. Tribal Historic Preservation Officers (THPOs) with facilities on their reservations, or off-reservation ceded and/or traditional use areas need to be on mail lists. [#13]*

Comment: *Page 232, under Department of Energy: Delete Battelle Labs, replace with Pacific Northwest National Laboratory. Delete Hanford, replace with: Richland Operations Office. Add Idaho Operations Office.*

Page 233: Add Wanapum People to list of Tribal Governments.

Page 234: Under Washington, add the Department of Fish & Wildlife

Page 237: Should the Benton County PUD be added to the list of Electric Utilities?

Page 240: Include Tri-City Herald and Spokane-Spokesman Review. [#22]

Response: The changes have been made; thank you.

Comments and Responses to *Glossary and Acronyms*

Comment: *Page 275, definition of T&E. Add NMFS after USFWS. [#1]*

Response: Thank you for bringing this omission to our attention. The definition has been corrected.

Comments and Responses to References

Comment: *Page 250: If information is used, add DOE 1999. Hanford Comprehensive Land-Use Plan Environmental Impact Statement, DOE/EIS-0222F. [#22]*

Response: Thank you. We feel that this plan will be very useful in site-specific analysis/planning for rights-of-way across Hanford. Because it will be used on a site-specific bases and not in this program-wide document, we did not add it as a reference for this document.

Comments and Responses to Appendices

FS Mitigation Measures and Background

Comment: *USFS to FS: A small item but isn't the USFS abbreviation incorrect and really should be either USDA-FS or just FS. [#36]*

Comment: *COMMENTS TO APPENDIX "F": USFS MITIGATION MEASURES AND BACKGROUND Page F-1: The reference on that page to BLM (middle of page) is inaccurate. The sentence should be revised to read: "These mitigation measures were developed based on current USFS Land and Resource Management planning documents." [#39]*

Response: Thank you. The corrections have been made.

Comment: *Page F-2: Second Bullet: Revise to read: "Proposals for herbicide use will be subject to the review, and either concurrence or approval, by an authorized Forest Officer." [#39]*

Response: Thank you; the revision has been made.

Comment: *Use of Herbicides: 1) Lolo National Forest Noxious Weed FEIS and Lolo Forest Plan Amendment 11 contains many mitigation measures for use of herbicides on Lolo National Forest. These requirements will need to be incorporated into any spray project proposals which will occur on the Lolo. I would suggest a copy of*

Amendment 11 be forwarded to BPA for inclusion into their planning documents if this has not already been done. [#36]

Response: This is a good example of the type of information that needs to be used in developing or updating right-of-way management plans with the Forest Service for corridors crossing FS-managed lands. As you mentioned, in this circumstance the mitigation measures for use of herbicides on Lolo National Forest should be incorporated into any spray project proposals for Bonneville corridors crossing these lands. Your comment will be forwarded to the Natural Resource Specialist in charge of Bonneville vegetation management activities in your area.

Comment: *Please change the mitigation measure on page F-2 of Appendix F to read, "When seeding, use native species unless the use of non-native species is approved. The appropriate Forest Service Line Officer must approve all seeding mixtures in advance. Consider topping trees as an alternative to felling." [#32]*

Response: Thank you; the change has been made.

Comment: *Also, DEIS Appendix F does not contain all of the mitigation measures found in Lolo Forest Plan Amendment 11. [#36]*

Response: We apologize if not all of the mitigation measures found in the Lolo plans are included in the Appendix; we recognize that they will need to be considered for site-specific vegetation projects. The Appendix is a tool to be used to help recognize and anticipate issues that may need to be addressed and documents that may need to be consulted for site-specific projects on Forest Service lands. It does not replace the need to work with the appropriate Forest when proposing vegetation management activities. The appendix is not all-inclusive, and is not meant to be, because the target is always moving — new Forest service plans are being developed, noxious weed EISs are being finalized, and so on. That is one reason that this information is in an Appendix for this EIS — because we did not want to "outdate" the Bonneville Vegetation Management EIS as soon as it was published.

Comment: *Page F-1: Fourth Paragraph under "Mitigation Measures Specific to the USFS": Revise the paragraph to read: "These mitigation measures will be used in reviewing, updating (as*

Public Comments and Responses

necessary) and developing site-specific vegetative management plans for BPA's facilities located on National Forest System lands. Additional measures may be used to adequately mitigate site specific environmental effects or concerns"

Page F-6, F-7: Recommend that the definitions of "Standards and Guidelines" be moved from Page F-7 and more appropriately be placed in front of all of the planning documents listed on these two pages, just prior to the list beginning with "Forest Plans". Standards and guidelines are common terms used in nearly all land and resource management planning documents. Placing the definitions of these terms as written makes it appear that they (the definitions) are applicable only to their use in the Interior Columbia River Basin Draft EIS's/Appendices. [#39]

Response: Thank you for the suggestions. Changes to this effect have been made.

Comment: *Page F-15, Third Bullet: We can't emphasize enough the importance of this bullet statement with respect to vegetative management activities on National Forest System lands. The statement: "Site specific analysis is needed for all projects" appears here under the "Wildlife and Fish" section of these Mitigation Measures. However, this is a statement that should more appropriately be stated elsewhere in Appendix F, to make it (a) direction applicable to ALL of the BPA's vegetative management activities on NFS lands. We recommend that at the very beginning of Appendix F, language be included which states the following: "Site-specific vegetative management plans, developed in accordance with the standards and guides of this programmatic EIS, should be developed by Program Managers in advance of implementing vegetative management activities on NFS lands. Existing vegetative management plans should be reviewed and revised, if necessary, to make them consistent with the Record of Decision and selected alternative of this EIS". [#39]*

Response: This statement regarding site-specific analysis through the development of vegetation management plans is stated in Chapter III. We have reiterated that statement in the appendix, as suggested.

Comment: *Herbicides and herbicide formulations: In Planning Step 2 (Identify Surrounding Land Use and Landowners/Managers), project*

managers are instructed to review site-specific vegetation management plans for consistency with both U.S. Forest Service and U.S. Bureau of Land Management mitigation measures, which are specified in Appendices F and G of the DEIS. Appendix F lists eight herbicide active ingredients that are approved for use by both USFS and BPA. Experience with USFS vegetation control in Oregon and discussions with USFS personnel indicate that only four herbicide active ingredients (glyphosate, picloram, dicamba, and 2,4-D) may be used in Oregon for any type of vegetation control on USFS lands. These herbicide restrictions result from the Mediated Agreement between the Northwest Coalition for Alternatives to Pesticides, the Secretary of Agriculture, and Oregonians for Food and Shelter (May 24, 1983). Similarly, Appendix G lists 20 active ingredients or combinations that are approved for use in vegetation control by both BLM and BPA. A footnote to this list indicates that throughout all of Oregon, herbicides may only be used for noxious weed control. Experience with BLM vegetation control in Oregon and discussion with BLM personnel confirms that throughout all of Oregon herbicides may only be used for noxious weed control. Only four active ingredients (glyphosate, picloram, or dicamba, and 2,4-D) or combinations (2,4-D plus glyphosate, picloram, or dicamba) may be used in Oregon on BLM lands. While these latter restrictions are stated on page G-2 of the DEIS, other comments by BPA about eastern Oregon restrictions are misleading. We recommend that project leaders carefully review these herbicide restrictions with USFS and BLM personnel as part of Planning Step 2, and that the Final Environmental Impact Statement reflect USFS and BLM policies more accurately. [#40]

Response: Thank you for noting the potential inconsistencies. We have reviewed the lists and made changes. Also, please note that the appendices are tools to help recognize and anticipate issues that may need to be addressed and documents that may need to be consulted for site specific projects on Forest Service or BLM lands. They do not replace the need to work with the appropriate Forest or district when proposing vegetation management activities for decisions such as determining appropriate herbicides to be used. The appendix is not all-inclusive, and is not meant to be, because the target is always moving — new Forest service plans are being developed, noxious weed EISs are being finalized, etc. That is one reason that this information is in an Appendix for this EIS — because we did not want to outdate the Bonneville Vegetation Management EIS with old data as soon as it was published.

Comments and Responses to Other Topics Related to this EIS

Comment: *I have read through the DEIS and have no problems with it. [#10]*

Response: Thank you for your comment.

Comment: *I would appreciate a look at the final proposal when completed or any other documentation that may come up regarding noxious weed control on BPA ground. [#10]*

Response: You will be on our mail list to receive the final EIS.

Comment: *Several times the Neitzel 1999 report was mentioned in our comments. A hard copy of the report will be sent to your office, however, it can also be accessed at : <http://www.hanford.gov> [#22]*

Comment: *A copy of the Hanford Comprehensive Land Use Plan EIS, DOE/EIS-0222F, also mentioned in our comments was sent to Tom McKinney at the Portland office. [#22]*

Response: Thank you.

Comment: *An individual from the Confederated Tribes of the Warm Springs Indian Reservation expressed appreciation for Bonneville's active role in practicing good stewardship of natural resources. [#31]*

Response: Thank you.

Comment: *Low-growing is better than herbicides. [#30]*

Response: We agree that the ultimate way to control tall-growing vegetation on the rights-of-way is to have low-growing plants that keep the tall-growing plants from sprouting in the first place. Getting to low-growing plant communities will take several cycles of maintenance that, in many cases, will require the use of some herbicides. Once low-growing plants are established, there will still need to be a mix of methods to treat/cut the tree saplings that are able to sprout through the ground cover of low-growing plants.

Comment: *You may wish to consider cycle length and type of cycle in your evaluation. Frequently vegetation on an entire rights-of-way does not develop at the same rate. However, a utility frequently treats everything as the slower growing vegetation will not wait until the next cycle. We utilize a "just in time" cycle. In this cycle, a vegetative cover type or tree is not worked until actually needed. THIS REDUCES THE COST PER YEAR TO MAINTAIN THE ENTIRE SYSTEM. Cycles within cycles require more intense planning and are trickier to manage but can reduce the frequency of impact for many sites and save money. A "just in time" cycle also reduces the visual impact to a right-of-way. [#5]*

Response: Thank you for offering this consideration. We believe this approach falls within Alternative MA1, Time-driven, because it calls for a cyclical vegetation management, with more frequent cycles. We didn't break this multi-cyclic process out of Alternative MA1 because, although specific vegetation may not be affected as often with this approach, overall impacts could be greater because of increased number of site visits and the cutting of larger trees. It would also seem that costs could go up for the same reasons. Reliability could be a problem when waiting to cut trees just before they become a threat to the lines, because there is a greater potential for some trees to grow more quickly than expected and actually grow too close to the lines.

Comment: *Based on my personal scientific and technical knowledge, I believe the use of a combination of the chemical, mechanical and manual methods outlined in the EIS will be effective and can be carried out with little or no adverse environmental impact or impacts on the health of humans. [#19]*

**Right-of-way
Methods Package
Alternatives**

Public Comments and Responses

Comment: *In general the [USFWS] supports the integrated approach which uses manual, mechanical, biological, and chemical methods to control vegetation on Bonneville Power Administration's (BPA) electric facilities, namely rights-of-way, electric yards, and non-electric facilities. [#40]*

Response: Thank you for your scientific review and comment. We think that this integrated approach is a good combination of providing effective vegetation control and environmental stewardship.

Comment: *I prefer: R2. [#7]*

Comment: *Alternatives R2 or R3 are both consistent with the methods outlined in our new EA. The Willamette EA addresses manual, mechanical, biological and herbicide control methods in powerline corridors. Treatment methods will be dominantly spot and localized, although some boom spraying from ATV's or trucks could be done. [33]*

Response: Thank you for your comment.

Comment: *We support Method package R3 (herbicides permitted with spot, localized, and broadcast application). [#29]*

Response: Thank you for stating your preference. We note that you would prefer that herbicide applications be used for noxious weed control only (your support for VS1 in a subsequent comment). As part of our program to help control noxious weeds throughout our system, we work with county weed boards. Some of the county weed boards and private landowners use aerial applications for treatment of weed infestations in their areas. We team with some of these parties to monitor and treat our rights-of-way as part of their area-wide treatments. Method package R3 would eliminate this possibility.

Comment: *I prefer: R4 You can improve the choices by: eliminating all but . . . R4 . . . Do not weaken your position or stance by accepting any choice but R4. [#2]*

Comment: *Of the choices offered in the Draft EIS, I prefer any methods that give the biggest amount of tools in the tool-box. This appears to be R4 [#8]*

Comment: *[Because of concerns for noxious weed control] we are supportive of your preferred alternative R4, which approves all methods of control. [#24]*

Comment: *R4, best alternative. [#28]*

Response: We also like this alternative because it gives us the most flexibility for the many different site-specific situations. We would combine this alternative with the planning steps to help determine the appropriate tools for the given environment.

Comment: *BPA needs to keep all possible methods of "management" available to maintain safe and effective power production and transport. [#2]*

Response: Thank you for your comment. Having all possible tools in the tool box allows us the most flexibility in determining the best way to control vegetation on a particular site.

Comment: *I believe we can use herbicides to establish this desirable plant community, then, over time reduce the use of herbicides down to as necessary to combat invasive weeds that have no pathogens or parasites to keep them from spreading rapidly. If the above [R4, VS3] alternatives are not followed, I think this would open up enforcement actions by both State and County Noxious Weed Authorities. This would result in fines and the work being done on large scale treatment and large amounts of herbicides which may or may not be on your approved list. [#8]*

Response: We agree. However, please note that we would not use herbicides that had not been through our process for approval.

Comment: *I am against any use of herbicides. [#9]*

Comment: *. . . we feel that the proposal is biased towards the use of herbicides rather than manual or mechanical forms of vegetation control. . . . While the [Squaxin Island] Tribe does not oppose the use of pesticides, we recommend that pesticides only be used as a last resort when other strategies have failed or are impractical. . . . For vegetation control we support the use of mechanical and manual methods. Soil disturbance can be kept at a minimum by raising mower heights as well as using vegetation species which do not require*

Public Comments and Responses

maintenance. . . . We support utilizing these methods for primary control and the use of pesticides only in extreme circumstances. [#14]

Comment: *AWR appreciates the Administration's need to control vegetation. However, based upon [discussion of concerns] the use of chemical control agents should be revisited. [#26]*

Response: Thank you for your comments regarding herbicide use; we appreciate your perspective. Please note that, for all of the proposed right-of-way alternatives, Bonneville would still rely heavily on manual methods of vegetation control (Figures IV-3, -4, -5, and -6).

Unfortunately, using herbicides only in extreme circumstances will not get us to a long-range goal of low-growing plant communities. Through past practices and experience of other utilities, we have found it difficult to keep up with vegetation growth without using herbicides for at least noxious weed control and deciduous species.

If we are able to use herbicides, together with other methods, to promote low-growing plants, we will be able to lessen the need for *all* maintenance activities, including herbicide use. We think that, in the long run, low-growing plants on the right-of-way by means of the integrated, judicious use of herbicides (not just as a last resort) will be the best for Bonneville and the environment.

Comment: *In particular, herbicide applications do nothing to change the conditions which allowed the noxious weeds or other vegetation to establish in the first place, and such applications may leave the soil bare, a condition that favors re-establishment. Therefore, the dependency on toxic chemicals to manage vegetation is difficult to overcome unless it is part of an explicit program to prevent the re-establishment of such vegetation and to eliminate the need to use herbicides in the future. [#26]*

Response: We agree that if herbicide applications resulted in bare-ground rights-of-way, then noxious weeds could reestablish. We are proposing an integrated approach of control that considers ways to prevent reestablishment of undesirable species, including promoting low-growing plant communities, reseeding where necessary, and timing of removal or treatment. (Note that herbicide treatments can often be less likely to leave bare soil than manual or mechanical means, because the herbicide kills roots without disturbing the soil.)

The use of some herbicide is an explicit part of the management goal of promoting low-growing plants along the rights-of-way. With this management goal, we hope to change the plant community on the right-of-way to be compatible with our needs, rather than keep fighting the battle with tall-growing plants. With this change there would be much less need for herbicide use in the long run, because there would be less need for maintenance in general.

Comment: *If you decide you must use herbicides (which I strongly protest), aerial and broadcast spraying should absolutely be banned from the program. [#9]*

Comment: *I do not like any kind of broadcast or aerial application of poisons of any kind. [#15]*

Comment: *EPA would prefer a management plan that avoids the use of aerial or broadcast methods for applying herbicides. However, we understand that there are terrain or weed conditions where aerial or broadcast spraying of powerful herbicides according to the label is the only feasible approach. Accordingly, EPA agrees with alternative R4, but urges Bonneville Power to restrict the use of aerial and broadcast methods in upcoming projects as much as possible so as to avoid deleterious effects on non-target plants and wildlife. [#34]*

Response: Thank you for your comment. Please note that, under Alternative R4, aerial and broadcast herbicide applications would be sparingly used for tall-growing vegetation on the rights-of-way, and somewhat more for noxious weed control. Please see Figure IV-6. Also note that, in the overall management goal of promoting low-growing plant communities, we state that one must be careful not to disturb existing low-growing or non-target plants. Using selective herbicide application techniques or selective herbicide products would be necessary to avoid harm to non-target vegetation.

Comment: *Don't spray any poisons. [#30]*

Response: We assume that by "poison" you mean "Herbicides." Please note that the EPA-approved herbicides we are proposing to use would be applied using protective measures (in planning steps), including requirements listed on the herbicide labels. These measures are important in keeping herbicides where they are needed for treatment and not affecting non-targeted areas (such as water bodies).

Public Comments and Responses

Comment: *While I personally am not too comfortable with aerial spraying, I understand it is least cost, and most effective for you. [#27]*

Comment: *The [Alliance for the Wild Rockies (AWR)], appreciates the opportunity to participate in this planning process and we support the Administration's effort to control vegetation using means which minimize adverse environmental impacts. However, AWR is concerned [with] several of the preferred alternatives, especially the R4/VS3 alternative, would permit Bonneville to utilize broadcast and aerial herbicide treatments, impacting both target and non-target vegetation. ... if (herbicides) are used, under no circumstances should broadcast and aerial methods be employed. [#26]*

Response: Thank you for conveying your concerns. Bonneville would like to have aerial and broadcast herbicide application methods in our vegetation management tool-box. However, we estimate that the number of rights-of-way that would be appropriate for the use of these methods would be limited (please see Figure IV-6.) Also, please note that the planning steps would help determine where these methods might or might not be appropriate for use (e.g., restrictions due to land use or natural resources present). The steps also provide a number of mitigation measures to lessen potential impacts, including ways to limit impacts on non-target species via selective versus non-selective herbicides, wind drift restrictions, observation of no-spray buffer zones, and complying with all label instructions.

One commenter mentioned that aerial application is the least cost method; this would probably be true for densely vegetated rights-of-way, but not be for many other right-of-way circumstances.

Comment: *Also, if wildlife is allowed in the right-of-way, they will help inhibit plant growth to some degree. [#15]*

Response: Yes, studies of rights-of-way on the East Coast have shown that wildlife plays a role in inhibiting tree growth by eating seeds and leaves of young saplings. On some Bonneville right-of-ways, browsing by deer and elk has been noted. However, the browsing is very species-selective, and controls the height of plants only to a limited extent.

Whether wildlife is allowed in the right-of-way depends on the underlying land use and on the presence of barriers associated with that use. Many rights-of-way are open space, and wildlife may come and go independently.

Comment: *If you don't kill the plants but cut and prune you won't have a revegetation question. [#15]*

Response: Pruning tall-growing trees along 15,000 miles of right-of-way is extremely expensive. Repeated pruning would have to be done very frequently. On the west side of the Cascades, some trees can grow 3 to 7 feet in one season (see below for examples of tree growth rates west of the Cascades). Bonneville is proposing that most vegetation in the right-of-way should be low-growing plants that do not threaten electric reliability. Also note that pruning often causes multiple stems to sprout, increasing the amount of vegetation control needed.

Species	Growth rate	
	(feet/year)	(feet/5 years)
Douglas-fir	3 - 6	15 - 30
Western redcedar	1 - 4	4 - 16
Bigleaf maple	5 - 8	20 - 44
Red Alder	3 - 8	12 - 32
Western hemlock	1 - 3	4 - 12

Comment: *Plant trees under the lines that don't grow high. [#30]*

Response: Because, in general, we can't have trees taller than 10 feet high under the line, we want to promote low-growing plants. Those plants can include trees, if they stay short. Unfortunately, there are not many "low-growing" tree species. Private landowners along our lines may obtain special permits from Bonneville to plant trees that are maintained at short heights (Christmas trees, orchards) as long as the trees don't block access to the towers or the roads. For Bonneville to plant low-growing trees, and nurture them until they hold their own would be very expensive. We will and do plant trees in special circumstances.

Public Comments and Responses

Comment: *An individual from the Quinalt Tribe had a comment regarding herbicides as they relate to labor; that local labor should be used to control vegetation in lieu of herbicides. Un- or under-employment was unacceptably high on tribal lands. [#31]*

Comment: *You can improve the choices by employing full-time staff to do vegetation maintenance along rights-of-way. Employ people rather than poison to control plants. [#15]*

Response: Contracts for vegetation removal are often bid on by local people. On Tribal Reservations, Bonneville has often offered contracts to do this work to qualified Tribal members. Regarding using labor instead of herbicides, we've found that the amount of work to control the vegetation in the right-of-way would increase without the use of herbicides (we have seen that through recent years). In the long run, the impacts on the environment also increase because of continual and increased maintenance activities as resprouts grow thicker and thicker.

Please note that Bonneville has 10 full-time staff and many hours of contract staff employed in controlling vegetation.

Right-of-way Vegetation Selection Alternatives

Comment: *I prefer: . . . VS3. . . . You can improve the choices by: eliminating all but . . . VS3. . . . Do not weaken your position or stance by accepting any choice but . . . VS. [#2]*

Comment: *VS3, any vegetation. [#28]*

Comment: *Of the choices offered in the Draft EIS, I prefer any methods that give the biggest amount of tools in the tool box. This appears to be . . . VS3. [#8]*

Response: Thank you for your comments and support.

Comment: *I do not like: Language written under "Alternative VS1-noxious weeds" (p. S-15) that reads "This alternative would allow us to keep in compliance with controlling noxious weed" when the BPA is not currently in compliance with controlling noxious weeds (e.g., on the Kootenai National Forest) (for noxious weeds currently designated by the State of Montana). [#7]*

Response: We've changed the text to more accurately portray the ability to be in compliance. Thanks.

Comment: *I prefer: VS1. [#7]*

Comment: *We support Vegetation Selection VS-1 (herbicides will only be used on noxious weeds). We support the use of alternative methods to control other non-desirable vegetation (other than noxious weeds). [#29]*

Comment: *Of the choices offered in the Draft EIS, I prefer herbicide - spot and localized for noxious weeds only. [#15]*

Response: This alternative would be good for ensuring that Bonneville has feasible tools for helping control noxious weed infestations. However, by limiting herbicide use to noxious weeds and not allowing the treatment of deciduous species, the probability of arriving at low-growing plant communities along the rights-of-way is low. Just as it is difficult to control noxious weeds without the use of herbicides, we have found that it is extremely difficult to control tall-growing species without at least some herbicide use. We are proposing to use an integrated approach—a mix of methods to control tall-growing species that includes the judicious use of herbicides.

Comment: *If herbicides are used, only noxious weeds and deciduous plants that compete with the low growing plants should be targeted. [#26]*

Response: As we've noted in the document, noxious weeds and deciduous plants are both very difficult to control without using herbicides. We are proposing to use herbicides in an integrated approach, for any vegetation depending on the site-specific resources present.

Comment: *Using herbicides on any type of vegetation would likely have adverse environmental impacts and should not be undertaken. In particular, the Administration should not use herbicides on plant species consumed by wildlife. [#26]*

Response: Thank you for conveying your concern. We are proposing to use herbicides on plants that we cannot have growing under our lines, while trying to promote low-growing plants. Please note that most of the herbicides proposed for use on rights-of-way rate *practically non-toxic* to *slightly toxic* to mammals.

Public Comments and Responses

Comment: *EPA can also support alternative VS3 which would allow herbicide use on any vegetation, but urges Bonneville Power to limit application whenever feasible to noxious weeds and deciduous plants and trees capable of re-sprouting. [#34]*

Response: Thank you for your comment.

Electric Yard Alternatives

Comment: *Of the choices offered in the Draft EIS, I prefer any methods that give the biggest amount of tools in the tool box. This appears to be . . . E1. [#8]*

Comment: *E1, selective herbicide. [#28]*

Comment: *In your Electric Yard Program, we support Alternative E1, because it appears that other alternatives (besides E1) pose a direct threat of electrocution to your maintenance workers. [#29]*

Response: Thank you for your comments. Yes, allowing vegetation to sprout within an electric yard poses a threat to those working in the yard. We have not found other feasible ways to keep plants from sprouting within the yard.

Comment: *Electric Yard Program: If ground cloths that help prohibit plant growth can be utilized in these areas it would reduce the need for maintenance as well as the use of pesticides. [#14]*

Response: Ground cloths are not feasible in these areas because of the work and safety issues with replacing them (digging up the gravel in an electrically charged environment). We have removed the mention of this method in Table II-1. We have also added more discussion of this method under our non-electric facility alternatives in Chapter IV. Thank you for bringing this to our attention.

Comment: *Finally, EPA agrees with Bonneville's proposed approaches to managing vegetation at electric yards and non-electric facilities, although Bonneville should attempt to minimize the use of herbicides when implementing these approaches. [#34]*

Response: Thank you for your comments.

Non-electric Alternatives

Comment: *Of the choices offered in the Draft EIS, I prefer any methods that give the biggest amount of tools in the tool box. This appears to be . . . NE1. [#8]*

Response: Thank you for your comments.

Comment: *Non Electric Program: It is preferable that landscaping utilize native plants to reduce the use of pesticides, fertilizers and water resources. Landscaping with native plants is aesthetically pleasing, virtually maintenance free, and requires no fertilizers and less irrigation. [#14]*

Response: Thank you for your comment. Most of Bonneville's landscape vegetation is established. When new plants are needed, we consider native plants and plants that require little maintenance.

Comment: *In your non-electric Program we support Alternative NE1 if the herbicides will only be used on noxious weeds and not to control other undesirable vegetation. It is unclear from the description if this was your intent since it just mentions "weeds" and not "noxious weeds." If the intent is to use herbicides to control any undesirable vegetation, then we support Alternative NE2. [#29]*

Response: Thank you for pointing out the need for clarification. Alternative NE1 would have herbicides available for use for control of any vegetation necessary, not just for noxious weed control. We have clarified this in the text. Given this, we note your support for alternative NE2.

Comment: *Alternative NE2 (S-17) the argument for using herbicides is often related to access and cost effectiveness. Therefore, landscaping at non-electric facilities should be readily able to utilize non-herbicide methods to manage noxious weeds. [#26]*

Response: There are advantages and disadvantages to all the methods. To control noxious weeds, herbicides have advantages of killing roots and being able to treat large infestations. Other "weeds" in landscaping could be treated with herbicides or other methods. We recognize your preference for the use of non-herbicide methods.

Public Comments and Responses

Alternatives Not Considered

Comment: *BPA failed to review the alternative method of running transmission lines underground through specially constructed cooling system thus eliminating the extensive need for vegetation management. [#22]*

Response: Thank you for suggesting other alternatives. However, reconstructing the transmission system is outside the scope of this EIS. Bonneville reviewed reasonable alternatives for vegetation management of our system. We did not review alternative methods of reconstructing the transmission system to avoid the need for vegetation management. Such alternatives do not meet Bonneville's need for "keeping vegetation a safe distance from existing facilities." This alternative is also not reasonable from an economic standpoint because of the billions of dollars it would cost to implement. There would also be great technological hurdles to clear in order to underground Bonneville's transmission system and still meet the needs of our customers. Therefore, we do not deem this a reasonable alternative that this FEIS needs to consider.

Comment: *No discussion about partnerships with public and private industries to utilize transmission rights-of-way for compatible uses that would maintain vegetation at optimum heights. Such actions as the berry industry, pulp and paper industry or Christmas tree farming were not reviewed. [#22]*

Response: Compatible uses under the rights-of-way are part of all the alternatives. About 1,440 miles of our corridors cross agricultural lands. These uses are addressed in the EIS in Chapter V (Affected Environments, Land Uses) and Environmental Consequences (Agriculture). Since Bonneville usually doesn't own the land under the transmission lines, we do not have complete control over the compatible uses. We have a permit process for compatible uses that include orchards and Christmas tree farms. These uses are compatible unless the vegetation is not maintained by the landowner (if trees grow too high or interfere with access to the facilities).

Comment: *Other Alternatives: The DEIS only addresses alternatives that manage vegetation in order to maintain safe operating clearances. The EIS does not address any alternative which manages the transmission facilities in order to maintain safe operating clearances. . . . I think that in some specific instances in which*

raising tower structures, adding new towers, minor route realignments, possibly even managing current loads during periods of high temperature to prevent unsafe line sags could be implemented as a way to allow vegetation to develop naturally and provide critical resource benefits while continuing to transmit electricity safely. This EIS process could address the specific planning steps which would identify specific conditions/locations where managing the transmission facilities rather than the vegetation would be appropriate. Further, site specific analysis would be needed to determine exact locations of new towers, right-of-way clearing, etc. [#36]

Response: Thank you for your thoughtful comment. Bonneville has in the past taken some of the actions you describe, and will probably continue to do so as part of its transmission system maintenance, development, and management activities. However, here we are examining alternatives that meet our need for keeping vegetation a safe distance from existing facilities. Our need is not to re-construct the transmission system to avoid interference from vegetation. Our facilities have already been constructed in a manner that takes into account the geographic features of each right-of-way. The alternatives for our vegetation management program need to be reasonable and effective for all the conditions covered by our 15,000-mile transmission system. As the comment notes, some of the suggested actions—such as raising tower structures, adding new towers, or route realignments—would apply only in some specific instances.

Comments and Responses to *Affected Environment* (Chapter V)

Comment: *Page 119, T&E species are listed by both USFWS and NMFS. [#1]*

Response: True, but plant species are listed only by the USFWS. To avoid this confusion, and for consistency with other sections, we have eliminated the sentence you refer to.

Comment: *Page 118, table V-1 shows white fir in mid elevations of the Blues and North Idaho. This is wrong. White fir occurs in southwestern Oregon. [#1]*

Vegetation

Public Comments and Responses

Response: Thank you for pointing this out. Reviewing *Abies concolor* (white fir) we found that it occurs in the Blues, but not in Northern Idaho. It also occurs in the Cascade range of Southern Oregon, as you stated, and Northern California, with some in Southern Idaho along the Utah border. We have updated the table.

Comment: *The reader is supplied with reasonable maps within the document which show the location of transmission lines, but unless I missed it, there was no text on the mileage of the transmission lines in each of the major ecosystems -- grasslands, shrub, and forest. [#22]*

Response: Thank you. We have added this information in the vegetation section, Chapter V, Affected Environment.

Comment: *Vegetation maps - do they show the vegetation types under all the lines? Portland shows-up as agriculture. [#30]*

Comment: *Figure V-2 Vegetation Type, you are showing light green (majority deciduous) in many places in Eastern Washington and North Idaho. Most are wrong. The major river bottoms are deciduous and the uplands are coniferous. [#1]*

Response: Please note that the vegetation map V-2 is gross in scale and is intended to give the readers a general idea of the distribution and range of vegetation types found throughout the system. At this scale, it is not possible to show deciduous plants in river bottoms in areas of mostly coniferous growth. The maps will not be used for site-specific vegetation identification. Given that, also note that we have made some changes to our maps to try to reflect vegetation types more accurately. Thank you for your observations.

Comment: *Vegetation types need to be revised and possibly expanded. Little mention is made of the shrub-steppe ecosystem although BPA on page 117 wants the reader to consider the shrubland ecosystem as containing the shrub-steppe ecosystem. Shrublands according to BPA can be located in high precipitation areas or low precipitation areas and is also Range Land. This classification is not practical and takes in too many independent ecosystems. I feel that the shrub-steppe ecosystem, a low precipitation ecosystem, warrants its own discussion since according to the maps provided, many miles of transmission lines cross this ecosystem type. Figure V-2, Vegetation*

Types, does not depict the shrubland ecosystem as stated on page 116 of the text. [#22]

Response: Thank you. We have added both discussion about this ecosystem and information to the map.

Comment: *Page 119, Table V-2, see Neitzell 1999. [#22]*

Response: Table V-2 addresses only Federally listed threatened and endangered plants. Thank you for the information on Washington State listed species in the Hanford Reach. We will pass the Neitzel report on to the Natural Resource Specialist who works in the Hanford Reach area.

Comment: *Page 121, last paragraph, "...crosses 10 sole-source..." however there are only 9 listed. [#22]*

Response: The Eastern Snake River Plain aquifer has been added.

Water

Comment: *Page 122, 3rd paragraph, sentence 3, clarify Snake River: "...and flows through Idaho and along the Oregon-Idaho border into Washington,..." [#20]*

Response: Thank you. The description has been clarified.

Comment: *Our Forest [Willamette National Forest] is in the process of completing a new Environmental Assessment for Integrated Weed Management. Many parts of the BPA preferred alternative will dovetail well with the Willamette EA. [#33]*

Response: Thank you for reviewing the EIS. We look forward to working with your Forest on a right-of-way management plan.

Comment: *Page 138, 2nd bullet: add Confederated Tribes of the Umatilla Indian Reservation [#22]*

Response: Thank you, the change has been made.

Land Ownership

Comment: *Page 136 identifies the current BPA facilities covered by direction in the Northwest Forest Plan on the Modoc National Forest.*

Public Comments and Responses

This is not currently the case. All current facilities operated by BPA under agreements with the Modoc National Forest are outside the area of the Northwest Forest Plan. [#32]

Response: Thank you for your observation. We have changed the document accordingly.

Cultural Resources

Comment: *Page 139; see Neitzel 1999 [#22]*

Response: See 22-14. Thank you for the information on the abundant cultural resources in Hanford Reach. We will forward this information to the Natural Resource Specialist who works on our facilities in your area.

Comments and responses to *Environmental Consequences* (Chapter VI)

General

Comment: *In addition to previously utilized chemical control agents for the program, the current document now proposes the use of a total of 24 herbicidal compounds singly and in combination. While we applaud the document for not suggesting solely the use of toxic herbicides, the Department has concerns over the effects that several of the herbicides may have on non-target species, particularly endangered, threatened, and proposed species. [#40]*

Response: Thank you for acknowledging that we are not proposing solely herbicides with high toxicity ratings. Please also note that, in response to comments we received on the draft EIS, we have dropped from our list some herbicides that had high toxicity ratings for aquatic species.

Vegetation

Comment: *We feel that the environmental risks of aerial application of herbicides to non-target species are unacceptable. [#29]*

Response: Thank you for your comment. Please note that, although the aerial spraying application *technique* is non-selective in the plant types treated, the herbicide *formulation* (chemical make-up) can be selective such that only the target vegetation will be controlled. For example, if a right-of-way is filled with conifer saplings, the herbicide

formulation could be one that primarily affects targeted conifers (not broadleaf) plant species.

Comment: *The BPA EIS did a fairly good job in presenting the case but . . . it appears that they have not given the shrub-steppe ecosystem much attention during their analysis but instead dwell mainly on forest system. . . . The reader is at a loss as to what BPA will do where transmission lines cross shrubland ecosystems. If no vegetation management will be done in these ecosystems it should be mentioned in the document. [#22]*

Response: The biggest potential for impact occurs when rights-of-way cross forests. Because the most intensive vegetation control needs to take place in those areas, much of the EIS is focused on determining the potential impacts and ways to avoid impacts in forest ecosystems. There is some vegetation control needed in shrublands (e.g., clearing sagebrush around poles for fire control, controlling tall junipers). Thank you for noting this lack. We have added discussion in the Chapter VI regarding potential impacts in shrubland.

Comment: *Page 162, the buffer widths for NRCS code 391A are national standards used in a general scope. Most States have supplemented this standard to fit their conditions and situations. There can be many widths depending on the circumstances. You should contact each state to obtain the state supplement to the national standard. [#1]*

Comment: *Rashin's 1992 study on aerial application of pesticides showed that pesticides were detected in streams following application on all the study sites monitored, thus being out of compliance with label requirements. The study recommended that a 90-meter buffer be applied along flowing streams. Manual and mechanical applications typically are at higher concentrations and droplet size of drift is also larger. . . . If pesticides are applied we recommend that a minimum 250 foot buffer be applied along all streams and wetlands and that drift into buffer areas be prohibited. [#14]*

Comment: *Page 62 and Page 161. It's somewhat unclear exactly what these riparian zones apply to. It appears to be a mix of different standards, some are BPA, some are BLM and others are NRCS. The Northwest Forest Plan buffers are only displayed in Appendix F. Perhaps it would be better to state that these are examples of potential*

Water

Public Comments and Responses

riparian zones but that site specific locations and management plans will dictate the actual distances. Restrictions on buffer distances may also be applied as a result of consultation for listed fish species under the Endangered Species Act. [#33]

Comment: *Riparian Protection: 1) Table III-1 Riparian Buffer Zones (page 62) needs to be thoroughly reviewed by fisheries biologist to ensure INFISH standards are being met with the proposed buffer zones. [#36]*

Comment: *We recommend that site-specific planning include a detailed examination of the environmental fate and effects of proposed formulated herbicide products such that more restrictive riparian buffer and herbicide-free zones may be used when necessary to protect natural resources, particularly endangered and threatened species, other wildlife, fish and aquatic organisms, and water. [#40]*

Response: Thank you for your comments. When developing the appropriate buffers for our proposed methods (including herbicide use), Bonneville reviewed and considered numerous standards at the national, state, and local level. Rather than list all the local buffer requirements (which are subject to change) in this EIS, we have established buffers that are appropriate for our facilities and methods. Our proposed buffers—which have been revised from the draft EIS to include the aquatic toxicity rating for buffer width consideration—are in place for our managers to follow when there are no other buffer requirements in the area. If different requirements are in a given area (e.g., T&E fish species may require a different buffer), Bonneville will use the local buffer widths **if** they are more strict than Bonneville's. We will not use more lenient buffer widths.

Please note that the references in the table (e.g., NRCS code 391A) are given to show where our buffers are consistent with other established standards.

Comment: *These applications (aerial application of pesticides) need careful monitoring to ensure that herbicides are not entering buffer areas and water. [#14]*

Response: Monitoring would depend on a site-specific instance of aerial application. Bonneville may initiate monitoring to determine application effectiveness and/or resource protection purposes. Monitoring may also be required at the request of regulatory agencies such as NMFS.

Comment: *Stream and wetland buffers provide many functions and by allowing herbicides to enter these protected areas certain functions are lost. [#14]*

Comment: *The site-specific planning steps for water resources state that "if using herbicides, it may be necessary to leave untreated zones (filter strips) to preclude the possibility of herbicide movement from the application site to adjoining water bodies." The [Oregon Department of Fish and Wildlife] requests that BPA always apply this mitigation measure near adjoining water bodies. [#21]*

Response: Bonneville will always consider appropriate buffers for herbicide use near water bodies to ensure that herbicide doesn't get into the water body and to protect important riparian habitat. In many cases, that will mean untreated zones near water bodies. However, in some instances, either noxious weeds or fast growing deciduous trees may grow immediately adjacent to streams and other water bodies. It may be necessary to treat noxious weeds (in accordance with local noxious weed authorities) and/or treat fast growing deciduous trees where transmission lines are directly threatened in riparian zones. In these situations, we will use chemicals with low aquatic toxicity ratings and low persistence combined with the least invasive application methods, such as spot treatments (basal and stump and/or injections). Bonneville will coordinate such activities with regulating authorities, where applicable.

Comment: *. . . increases in water temperature as vegetation is removed, etc. [from herbicides] [#26]*

Response: If vegetation is removed from stream banks *by any means or methods*, there is a potential for increase in water temperature. We have a mitigation measure in place for water resources to "leave streamside vegetation intact where possible" to help mitigate potential streamside vegetation removal impacts.

Comment: *Riparian Protection: 3) The study cited on page 167 has been taken completely out of geographical context. The climate, soils, vegetation are all completely different between New York and the Pacific Northwest. Surely there is a study applicable to the Pacific*

Public Comments and Responses

and Inland Northwest that discusses the impacts of removing overstory along stream reaches. [#36]

Response: Extensive studies have been carried out on the East Coast on the impacts of utility rights-of-way across a variety of landscapes. We have not found any rights-of-way studies in the Northwest for stream crossings (most of the studies conducted in this area are of the impacts of clear-cuts on stream temperatures, not of small lengths of clearing). We acknowledge that there are definite differences between climate, vegetation, and soils from what we find here in the Pacific Northwest. However, there are still some things we can learn from these studies. Please note that we did not rely on this information to draw definite conclusions about impacts that would be observed here.

Comment: *All of the pesticides listed in the BPA proposal are restricted for use in or near water and/or wetlands. [#14]*

Response: The herbicides listed in the EIS are all registered for "terrestrial use only" with one exception: glyphosate. Glyphosate is registered for use on land or water. However, in most states a special permit is required in order to apply herbicides in water; such an herbicide is usually used for special lake plant infestations or ditch vegetation removal. Bonneville is not proposing use of any herbicides in water. Where Bonneville needs to use herbicides *near* water, all appropriate label instructions and restrictions will be applied in order to protect both surface and groundwater resources.

Comment: *Also, any application around water bodies should be done with the utmost care, especially when using products such as benefin, pendimethalin and trifluralin which are highly toxic to numerous aquatic species. We would advise the maximization of buffer and herbicide-free zones when applying all compounds but especially when highly toxic compounds would be applied around water. [#40]*

Response: We agree that water bodies need special consideration. Please note that Bonneville has dropped some herbicides (the three named above) with high toxicity ratings to aquatic species from the list proposed in the draft EIS. We have also added the consideration of toxicity to the buffer zones to maximize protection of these resources.

Fish and Other Aquatic Species

Comment: *The Draft EIS is lacking an analysis of the Threatened and Endangered Species. Particularly the effect of applying herbicides along stream banks where salmon spawn in cool water and are protected by riparian vegetation. [#6]*

Response: Bonneville will depend on outcomes of a biological assessment/consultation process with NMFS and USFWS for appropriate measures for T&E fish species protection. We are currently in the process of a program-wide consultation, the results of which will be incorporated into our vegetation management program.

Comment: *Riparian Protection: 4) Mitigation Measures, states "Apply all appropriate mitigation measures for water bodies". These "appropriate mitigation measures" should be referenced or stated as there is no way of knowing what these measures are. [#36]*

Response: Thank you for alerting us to this. The statement you are referring to was in the Fish section on mitigation measures. The measures referenced for water bodies are listed in the Water section of Chapter VI. Many mitigation measures apply to both resources. We have added a reference indicating where this information can be found.

Comment: *The Squaxin Island Tribe appreciates the opportunity to review and comment on BPA's Vegetation Management Program. As land and fisheries managers we are currently faced with many controversial issues. Several issues of concern include salmonid health, the preservation of fish habitat and water quantity and quality. . . . All pesticides toxic to aquatic life and subject to soil leaching should be prohibited from further use. These chemicals include but are not limited to: triclopyr, trifluralin, pendimethalin, dimethylamine (2,4D), benefin, bromacil, halosulfuron-methyl, hexazinone, and picloram. [#14]*

Comment: *When selecting a particular herbicide, consider using newer products, which often pose lower risks. [#34]*

Comment: *The [Oregon Department of Fish and Wildlife] appreciates the opportunity to comment on [the DEIS]. The Department's comments pertain to the vegetation management in right-of-way, rather than electric yards and non-electric facilities. The Department generally support's BPA's proposed mitigation measures to reduce the impacts on fish, wildlife and their habitat.*

Public Comments and Responses

However, the Department would request that BPA consider the following changes or additions to those mitigation measures. First, the Department strongly supports the use of riparian buffer zones and herbicide-free zones described in Tables VI-2 and VI-3. However, due to their high toxicity, the Department requests that BPA refrain from using the following herbicides within 30.5 m (100 ft) of waterways, regardless of the application method: 2, 4-D (highly toxic to aquatic organisms in some formulations); Benefin (highly toxic to aquatic organisms); Diuron (highly toxic to aquatic invertebrates); Pendimethalin (highly toxic to aquatic organisms); and Trifluralin (very highly toxic to aquatic organisms). [#21]

Response: Bonneville has looked carefully at the risks posed by using herbicides. Some of the herbicides that are included in our list are newer products that have lower risks (chorsulfuron, fosamine, metsulfuron, and sulfometuron). As part of this EIS, Bonneville has chosen to prohibit the use of certain herbicides having longstanding health or environmental issues. Prohibited herbicides include: atrazine, prometon, simazine. We have further dropped from our list and will prohibit the use of three herbicides that were in the draft EIS: pendimethalin, benefin, trifluralin. Herbicides selected for use within the programs covered in this EIS will be carefully used following the instructions and restrictions EPA has required the manufacturers to place on their labels.

In addition, Bonneville has many Best Management Practices in place, developed as a result of this EIS, to further reduce potential impacts that may be caused by the use of herbicides. These include our riparian zone buffers and pesticide-free zones. We have updated our herbicide buffer widths to include the consideration of aquatic toxicities and ground water or surface water advisories, as well as other mitigation measures resulting from consultations with Tribes and other state and federal agencies when vegetation management affects Tribal lands or other resource issues such as threatened or endangered species.

Comment: *In light of the Endangered Species Act and the numerous proposed listings for wildlife and salmonid species, it has become essential for managers to lessen the environmental impacts of their activities. [#14]*

Response: We agree and hope that the planning steps will ensure that the environmental resources are considered when making decisions for appropriate methods of vegetation control.

Comment: *Several of the pesticides are toxic to fish and have the potential to cause ground water contamination. [#14]*

Response: Bonneville is highly sensitive to the protection of all aquatic species. Generally, EPA requires manufacturers to place a warning on herbicide labels in cases where toxicity to fish is an issue. Based on your comment and others, Bonneville has taken steps to identify those herbicides having aquatic toxicity issues and has either prohibited or restricted their proposed use near water or riparian areas (please see updates to the herbicide buffer zones). EPA has also required manufacturers to place a warning on the label in cases where leaching or runoff may be an issue.

Comment: *Fish and animals need protection against herbicides. [#30]*

Response: Thank you for voicing your concerns. Mitigation measures are in place to keep herbicides from getting into water bodies. Please note that of the 23 herbicides we are considering for use 21 are rated either *practically non-toxic* to *slightly toxic* to mammals, with two rating *moderately toxic* to mammals. Buffer zones will be provided to protect fish and water resources.

Comment: *Use of Herbicides: 2) The BPA DEIS seems to have a fairly subjective tone making assertions that herbicides are not harmful, yet the DEIS does not cite references to fully support this position. For example, on page 168, the DEIS states "There is little potential for fish to be exposed to herbicides: mitigation measures . . . only a relatively small amount of area would be treated within a landscape." The DEIS does not state the effectiveness of the mitigation measures nor does it cite research work that confirms this assertion. [#36]*

Response: We realize that herbicides, if not used properly, can cause impacts. We have analyzed all the herbicides that we are proposing for use, and developed buffers and mitigation measures to be followed. With these measures in place, risks of impacts are greatly reduced. The citations for research for the effectiveness of the measures are footnoted in the buffer and toxicology tables. All herbicide references can be found in the **References** chapter.

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Comment: *Use of Herbicides: The DEIS also makes some contradictory statements. For example, on page 168, the DEIS states that "many of the herbicides proposed by Bonneville are low in toxicity to fish", yet in Table VI-6 (page 175) 11 of the 24 herbicides are listed as moderately to highly toxic to aquatic resources. In addition, two of the herbicides listed in this table do not have any aquatic toxicity data. Eleven of 24, possibly 13 of 24 herbicides being moderately to highly toxic does not match the assertion on page 168 that many of the herbicides are low in toxicity. [#36]*

Response: Bonneville assumptions were based on the fact that some herbicides would only be used in substation environments, while others would be only used along rights-of-way. The final EIS clarifies which herbicides would be used for each facility type. Also, please note that we have dropped some herbicides from the list of herbicides proposed in the draft EIS —benifin, pendemethalin, and trifluralin (all had high aquatic toxicity ratings) and have completed all toxicity data in the tables.

Wildlife

Comment: *I did not find in the text of the document any discussions on State Sensitive Species, nor did I locate any information on the Migratory Bird Treaty Act. [#22]*

Response: Thank you for catching these omissions. We have incorporated state sensitive species into several chapters throughout the final EIS, and we have added a discussion of the Migratory Bird Treaty Act in "Other Requirements" at the end of Chapter III.

Comment: *Finally, the Department requests that BPA consider timing restrictions to reduce impacts on wildlife species in addition to federally listed threatened and endangered species. The state of Oregon has listed several species as threatened or endangered that have not been listed by the federal government. These species include the Arctic Peregrine Falcon (*Falco peregrinus tundrius*), the Kit Fox (*Vulpes macrotis*) and the Wolverine (*Gulo gulo*). The Department has also listed numerous species as "sensitive". Prior to significant vegetation management activities, BPA should contact local Department biologists to discuss timing such activities to avoid unnecessarily impacting these species. [#21]*

Response: Thank you. We have added a discussion of state-sensitive species to the text and a mitigation measure for site-specific vegetation management to contact the state fish and wildlife departments to determine whether there is a potential for impacts on state-listed species and, if so, measures to avoid impacts.

Comment: *Herbicide Use - the DEIS states that wildlife would not be impacted by herbicide use. Since the direct impacts associated with herbicides are at best uncertain, and will vary depending upon the chemical agent, this statement does not seem well founded. [#26]*

Response: The EIS states that the potential for wildlife to be affected by herbicides is based on whether an animal is exposed, whether the exposure amount is enough to cause effects, and what the toxicity of the herbicide is to the animal. All but two of the herbicides on our list are rated *practically non-toxic* to *slightly toxic* to mammals and avians. Of the two that are rated moderately toxic to mammals or avians, one would be used mostly in electrical yards and the other for landscaping and workyards where there is little wildlife. There is potential for impact on non-target resources with our program; we have worked to limit that potential.

Comment: *The vegetation management plan for rights-of-way should consider corridors and their impacts on particular wildlife species in more detail. [#26]*

Response: Detailed discussion of potential impacts on particular wildlife species is not relevant at this level of analysis. It would not be feasible to analyze all the impacts of such a large and diverse area in this document. The planning steps developed in this EIS are to ensure that site-specific impacts are considered when actual projects are to take place.

Comment: *Although the Administration wants the longest possible maintenance free period, shorter period should be considered if impacts to threatened and endangered species are possible. [#26]*

Response: We agree. Bonneville will take appropriate measures for T&E species, if they are present.

Public Comments and Responses

Comment: *Furthermore, herbicide use may include the removal of vegetation upon which wildlife species rely . . . [#26]*

Response: Bonneville needs to remove some vegetation in the right-of-way. We hope to promote low-growing plants, many of which wildlife species use. The use of any method of vegetation control that is non-selective can unnecessarily remove non-target vegetation. Some herbicides and herbicide application techniques can affect non-target species; many do not. The concept being proposed is to use methods that will support low-growing plant communities, which we believe will not only be more efficient for Bonneville, but will increase wildlife habitat along the right-of-way.

Comment: *Listed species: Washington Cascades Only: The western portion of the Cascade Mountains in the State of Washington are associated with federally listed and proposed threatened and endangered species under the Endangered Species Act (ESA). Of the species that may be impacted by the program, the bald eagle, the spotted owl, the marbled murrelet, and bull trout are of particular concern. Not only are direct, indirect, and cumulative effects of concern, but secondary poisoning is also an issue that will need to be addressed when considering the use of chemical control methods around habitats that contain higher trophic level organisms. . . .*

Due to the aforementioned concerns, information provided in the proposed integrated approach, especially the chemical control methods, may have adverse impacts and may have effects on listed species. [#40]

Response: Thank you for voicing your concerns. Secondary poisoning by herbicides is also called bioaccumulation. Bioaccumulation can occur when there is a potential for some animals, such as rodents, to accumulate chemicals in their system; predators who eat the rodent may then be poisoned. We have added information to the document on the potential of the various proposed herbicides to bioaccumulate. Consultation on these species regarding herbicide use will provide appropriate measures to address potential impacts.

Your comments, as well as others received on the draft EIS, have helped us further develop our program to lessen potential impacts (e.g., dropping some herbicides from our proposed list, including toxicity ratings for buffer zone considerations, ensuring the USFWS is in the loop for approving new techniques as appropriate). We are proposing

using the planning steps for site-specific projects so that good decisions can be made to control vegetation, with limited impacts.

Comment: *Temporal issues are also of concern. The time of year chemical control agents are used is critical and should not coincide with such activities as bald eagle and marbled murrelet nesting as well as bull trout spawning and incubation. [#40]*

Response: We agree that timing of vegetation management activities (by any means) can potentially affect some species. Site-specific or programmatic consultations will provide appropriate measures to ensure that timing is considered so that the activities will not coincide with critical T&E species activities.

Comment: *Also, low level aerial applications of herbicides may cause disturbances to threatened and endangered species. [#40]*

Response: We agree that noise of aerial applications could disturb threatened and endangered species. Site-specific analysis and consultations (if appropriate) should ensure that harmful noise disturbance of T&E species does not occur.

Comment: *The document refers to herbicides simply in terms of "active ingredient". Several of the compounds listed in the program have different formulations such as glyphosate and triclopyr. The different formulations contain different amounts of active ingredient, different inert compounds, and different adjuvants all of which determine the fate and effects in the environment, thus making it difficult to assess the potential toxicity to our trust resources. . . .*

Chapter IV [VI] also discusses toxicity as one factor that determines if an herbicide will cause adverse effects to fish or other aquatic resources. In addition, differential toxicity among herbicides is described and BPA states that using less toxic herbicides "in the vicinity of fish-bearing lakes or ponds would reduce the potential for adverse effects." The [USFWS] agrees with this assessment, however we recommend that evaluation of the toxicity of formulated herbicide products (not active ingredients) be included in site-specific planning, perhaps under Planning Step 4. . . .

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... general riparian buffer and herbicide-free zones are presented as mitigation measures to reduce potential contamination of water resources. As discussed in Chapter VI of the DEIS, the physical properties of herbicides partly determine environmental fate. . . . The DEIS does not specify which formulated herbicide products will be used in vegetation management, so the [USFWS] cannot comment on potential adverse effects. [#40]

Response: Bonneville recognized early in the preparation of the EIS that different formulations of the same active ingredient might increase *or* decrease the actual toxicity of the product. We chose not to list all the toxicities for all the different formulations because the list would be large and cumbersome, and because we want our mitigation measures and guidance to be based on herbicide *characteristics* rather than on specific formulations. Instead, we chose to use a worst-case assessment in reporting the human and ecological toxicities. That is: when all of the toxicological values for a specific active ingredient were compared against the different formulations of that active ingredient, Bonneville always used the most toxic value. That way, Bonneville believes the relative toxicity may be less but never more than that listed in our tables.

We have also reviewed the toxicological data for inert ingredients and adjuvants. The inert ingredients of the herbicide formulations considered in this EIS are not classified by the USEPA as inert ingredients of toxicological concerns to humans or the environment. Information on inerts and adjuvants has been incorporated into Chapter VI of the final EIS.

Comment: *The [USFWS] requests that BPA limit use of the following herbicides due to the lack of data on the toxicity to fish and/or wildlife: Halosulfuron-Methyl; Imazapyr; and Sulfometuron-Methyl. [#21]*

Response: Those chemicals lacking toxicity data in the draft EIS have been researched; the information has been incorporated into this final EIS, please see Table VI-6.

Comment: *... the EIS discusses feathering. However, inadequate analysis is presented as to edge effects, how to minimize such effects, impacts on interior forest. [#26]*

Response: Chapter VI, Environmental Consequences, Wildlife section, discusses both the potential positive and negative edge effects. This impact is also discussed in NEPA documents when we are considering new transmission line routes. It is more of an impact resulting from constructing a new line across a forest, than of keeping an existing line maintained.

Comment: *Impacts from other [non-herbicide] methods can be mitigated in various ways (e.g., noise disturbance to T&E wildlife can be timed to avoid their nesting and denning periods). [#29]*

Response: We agree that many of the *short-term* impacts of manual and mechanical methods can be lessened or eliminated with appropriate mitigation measures. However, the greater impacts of using these methods alone are in the *long term* when vegetation resprouts. When cut, deciduous vegetation resprouts with an increased number of stems. This creates more thickly vegetated rights-of-way that need to be managed even more intensively. The rights-of-way then need more extensive clearing, and more vegetation per acre needs to be cut with each successive maintenance cycle. When densely vegetated areas are cleared, environmental impacts are more drastic compared to the selective removal of trees or brush. More habitat is affected, more soil is disturbed, non-target plants that have grown in shade-tolerant situations are suddenly exposed, human presence on the right-of-way is increased, and visual impacts are more sudden and dramatic.

Comment: *It is our understanding that the current authorizations and agreements between Bonneville Power Administration and the Modoc National Forest continue to be in effect. The process outlined in the DEIS is not consistent with these agreements. Until such time as [Bonneville] completes the processes necessary to formally transfer land management responsibilities from the USDA Forest Service to the US Department of Energy for the right-of-way, the approving and deciding official for site-specific projects, which may affect the environment, remains the appropriate Forest Service line officer. [#30]*

Comment: *Vegetation Selection: As stated above, the Forest is very supportive of vegetation treatments with herbicides for noxious weeds (VS1). If deciduous species need to be treated on Willamette NF land*

FS- and BLM- Managed Lands

Public Comments and Responses

(VS2 or VS3), additional NEPA analysis will need to occur because the 1999 forest-wide Integrated Weed Management EA covers herbicide use on only newly invading weed species. [# 33]

Comment: *NEPA Responsibility: On page 185, BPA makes the statement that "the decisions on vegetation management of rights-of-way across USFS and BLM managed lands are Bonneville's and therefore Bonneville is responsible for complying with NEPA." And goes on to state "The USFS and BLM usually would not have a decision to make (that would trigger their NEPA process) unless the proposed vegetation management were not consistent with their existing plans and regulations." The Memorandum of Understanding between BPA and USFS dated 1974 (FSM 1531.73a) provides for BPA's occupancy and use of National Forest lands consistent with laws applicable to the management of National Forest System in Item 1. Also, Item 6 provides for a subsidiary MOU to implement the master agreement. In the Subsidiary Memorandum of Understanding dated 1974 (FSM 1531.72a, FSM 8/83 R-1 Supp 41) Section 1B. Environmental Analyses and Environmental Impact Statements states that "Bonneville and the Forest Service will conduct environmental analyses and prepare environmental impact statements in accordance with their individual procedures". It also states that "When an environmental statement is to be prepared, the agency initiating the proposal will take the lead in statement preparation. The other agency will actively participate in development of the statement by (1) providing...existing information...and (2) review and comment on the draft and final environmental statement." Thus, the wording in the DEIS is not entirely correct and could mislead agency as well as public individuals as to whose responsibility the decision making really is. As I see it the FS has only granted BPA the occupancy and use of National Forest lands not the ownership nor management responsibility of these lands, in addition, the FS and BPA have agreed that environmental assessments will be conducted in accordance with their individual procedures. This section (page 185) should be rewritten in order to clarify BPA's role as they it crosses National Forest lands. The existing MOU's provide a lot of direction regarding roles of the various agencies. [#36]*

Response: Thank you for your comments and noting the need for clarity. We have updated the statement in the EIS as follows:

“Bonneville, the FS, and the BLM all have decisions to make regarding vegetation management of rights of way across National Forest or Management Areas. Typically, as the owner

and operator of the transmission facility, Bonneville will propose the vegetation management action. Under NEPA regulations and agreements between the agencies, this means Bonneville will usually have primary responsibility for completing the environmental impact analysis needed. Each agency will then use this analysis in its own NEPA compliance process and base its decisions upon it. Bonneville's decision will most often be on how to manage vegetation on a right-of-way. The Forest Service or BLM will decide whether Bonneville's proposed action triggers their need for NEPA, and if so, whether the action is consistent with their Forest or Management Area plans."

Bonneville recognizes that if we propose an action on Forest Service lands that is not consistent with the Forest plans and prior decisions, new Forest Service decisions may need to be made. These decisions would require NEPA analysis consistent with Forest Service regulations.

Please note that Bonneville is preparing this EIS to provide the NEPA coverage needed to control vegetation at its facilities across our service territory, including on National Forest and BLM lands. As a cooperating agency on the EIS, the Forest Service can adopt the EIS and issue its own Record of Decision to allow it to approve a Bonneville proposal to control vegetation. If Bonneville adopts one of the action alternatives, then the following process would apply to Bonneville rights-of-way and electrical facilities on National Forest lands. (As a cooperating agency, the BLM is proposing to adopt this EIS and issue a ROD.)

For site-specific vegetation management projects, we are proposing to prepare a Supplement Analysis. This is our equivalent to the Forest Service's Interdisciplinary Review. Bonneville would work with the checklist referenced in Chapter III of the EIS to study the site-specific impacts of the management regime proposed. This would include, for instance, consultation with the USFWS regarding T&E species, public comment, and consultation with the Forest Service. If the impacts of the site-specific action were no more than what Bonneville anticipated in the EIS, then Bonneville could conclude its NEPA compliance for the project with the Supplement Analysis. If the Supplement Analysis showed the impacts would be greater or other than those examined in the EIS, then Bonneville would supplement the EIS. Because the Forest Service is a cooperating agency on the EIS, it could adopt the EIS, issue a ROD after completing its public process, and approve

Public Comments and Responses

Bonneville's proposed action described in the Supplement Analysis/supplemental EIS.

Other Federal Agencies

Comment: *Page 187, 5th bullet: To what degree has the notification [of other Federal agencies] been done? It appears that it was not done for Hanford, unless receiving the draft was the extent of the notification. [#22]*

Response: The bullet referred to is when site-specific vegetation control is needed. However, notification and request for comments on this Program-wide EIS was done through letters requesting input for scoping the program, a follow-up Fact Sheet explaining what we heard during scoping, and the draft EIS for comment. Hanford has been on our mailing list to receive all mailings regarding this EIS process.

Tribal Lands

Comment: *Several commentors stated that trust needs to be built between Bonneville and the Tribes for planning and implementing programs. Firmly established mutual trust would provide long-term relations between the Tribes and Bonneville. [#31]*

Response: We agree, and hope that by including input from the Tribes in our overall program, and working together on individual projects, trust and long-term relationships can be built. Thank you for voicing this aspect of working together.

Cultural and Historic Resources

Comment: *As a traditional weaver and teacher I would oppose to the use of any herbicides because of not knowing the effect on plants, animals, water, roots, and materials used for weaving. [#12]*

Response: Thank you for your comment. We have added a measure to the planning steps in the Cultural Resources section to notify Tribes with traditional-use areas in the project area to help determine if there are any traditional-use plants that need to be considered when determining vegetation control.

Also, please note that Bonneville would apply herbicides to target plants and limit effects to non-target vegetation as much as possible. To protect human health, Bonneville would follow label instructions requiring an interval of time to go by before using the application area or vegetation within that area.

**Public Health
and Safety**

Comment: *Page 195, 6th paragraph, 2nd sentence: at the end of the sentence add "or exposure to downwind draft". [#22]*

Response: The addition has been made; thank you.

Comment: *I was quite distressed upon reading your "transmission system vegetation management program." I am appalled that you are proposing (and probably already using) herbicides with a toxicity category II, III, and IV! [#9]*

Response: Thank you for conveying your concerns. Please note that toxicity categories are defined and used by EPA in describing the acute toxicities of herbicides relative to human receptors. These toxicity ratings are used by EPA to determine label requirements and warnings (such as establishing personal protective apparel for applicators, reentry intervals after application and other warnings) for the specific formulations. Categories range from Category I (Highly Toxic) to Category IV (Practically Non-Toxic). As listed on Table VI-7 of the EIS, most of the herbicides proposed for use by Bonneville fall in the Category III (slightly toxic) and Category IV (practically non-toxic) range. The Herbicide Fact Sheets, Appendix H of this document, contain the source material for the information presented in the tables.

Comment: *These same herbicides are carcinogenic, teratogenic, mutagenic, and effect reproduction. (2,4-D is notorious for causing problems.) [#9]*

Response: The effects you are describing are chronic toxicity effects. Chronic toxicity is the amount of a pesticide that will cause injury during repeated exposure over a period of time. Bonneville has listed chronic effects such as carcinogenicity, teratogenicity, etc., on Table VI-7 of the EIS. Most of the chemicals showed no adverse effects or some effects at doses higher than the "no observable effect level" (NOEL). In the event a chemical has such effect at or below the NOEL, EPA requires a chronic toxicity warning to be placed on the label along with appropriate precautions and mitigation measures. None of the herbicides being proposed for use in our program (including 2,4-D) have chronic toxicity concerns requiring such labeling.

Public Comments and Responses

Comment: *And you are actually proposing to use aerial spraying of some of these toxic chemicals? [#9]*

Response: Yes, we are proposing limited aerial spraying. Only some herbicides are registered for aerial applications. The herbicides on our list that could be used for aerial applications are imazapyr and metsulfuron, which have relatively low toxicity ratings. Also, the planning steps will insure that the land uses and the natural resources present are considered when determining whether aerial spraying is an appropriate method for use.

Comment: *Herbicide treatments have caused historic and repeated problems at numerous junctures, including manufacturing, transport, storage, application, dispersal, transformation into other toxic chemicals and disposal. [#26]*

Response: Thank you for voicing your concerns. The EIS addresses logistical, application, safety, and health risks of using herbicides. These issues have also been studied at length by the Environmental Protection Agency (EPA) and the Federal Occupational, Safety and Health Administration (OSHA), resulting in label requirements, and Material Safety Data Sheets (MSDS) to reduce risks. Bonneville understands that such risks can never be completely eliminated, but knows that risks are minimized greatly by complying with federal requirements for herbicide use, providing Annual Herbicide Certification for employees, and providing additional mitigation measures for herbicide use. Please also see other responses to comments on herbicides.

Comment: *In addition, the direct effects of numerous herbicides are being found to affect the endocrine systems of both wildlife and humans. This can compromise development, reproduction, behavior, sexual integrity, and immune and nervous system functioning. [#26]*

Response: Thank you for your comments. We have reviewed all the herbicides we are proposing for use, and none of them are endocrine disruptors (they do not affect the endocrine system). One herbicide (triflurilin) that was in our draft EIS has potential effects on the endocrine system, but we have dropped that herbicide from our list.

Comment: *Projects should avoid to the extent feasible certain ingredients which are broad-spectrum and/or persistent and/or appear to affect non-target species. Of particular concern are bromacil, 2,4-D, dichlobenil, oryzalin, pendamethalin, triclopyr, and trifluralin. EPA is reassessing these ingredients for future use under the Food Quality Protection Act of 1996 which requires the Agency to consider all non-occupational avenues of exposure in its risk assessment. [#34]*

Response: Please note that our proposed use of broad-spectrum herbicides is limited to places where total vegetation control is necessary (electric yards, around wood-pole towers for fire protections, and in maintenance work yards). With respect to human health and environmental issues, Bonneville has assessed the available information for the herbicidal chemicals we intend to use as a result of this EIS. We believe that since we are prohibiting certain herbicides from use (e.g., pendimethalin and trifluralin), and restricting the use of other certain herbicides (using stricter buffer zones for herbicides with moderate and high toxicity ratings such as formulations of 2,4-D, dichlobenil, oryzalin, and formulations of trifluralin), Bonneville has reduced the risk of using herbicides as much as practical. We will keep current on studies of herbicides and include new information in our program as appropriate.

Comment: *"Integrated Vegetation Management is a strategy to cost-effective control vegetation with the most benign overall long-term EFFECT ON PUBLIC HEALTH AND SAFETY AND THE ECOSYSTEM. . . . I was told by my mother that it is important to protect everything in our circle of life because one thing depends upon the other, everything on this earth has a purpose. . . . I think that it is very important for the agencies to deal with the methods appropriately and with respect not only for Mother Earth but also the people. I would like to be informed of any hearings that will be held in the Aberdeen area so that I can attend. [#12]*

Response: Thank you for your perspective. We hope that with the planning steps in place for determining the specific circumstances at any given area needing vegetation control, Bonneville will be able to make wise decisions for the appropriate use of methods and mitigation measures in an integrated approach. As we indicated in an e-mail to you, we did not conduct any public meetings in the Aberdeen area, but would have been happy to schedule one with you if you have a group that would like to meet.

**Cumulative
Impacts**

Comment: *As a government agency, you should be protecting us. Those of us who live in Skamania County are already bombarded by pesticides from the county, the state, Southwest Washington Health District, PUD, the railroad, gas lines, plus what private citizens spray. You are not the only ones using pesticides. Please keep that in mind. Of course I understand the need to keep down vegetation but you have better, safer means. . . . You must consider the health of the entire ecosystem, of which we are a part. . . . Finally, the cumulative effect of herbicide applications are difficult to quantify and are not adequately understood. [#9]*

Response: Thank you for voicing your concerns. Bonneville has considered the potential cumulative impacts of our vegetation management program when added to other past and present actions by other parties (see Chapter VI Cumulative Impacts). With this in mind, we have worked to develop a proposal to keep our system reliable while minimizing impacts. We think that promoting low-growing plants (with the integrated use of some herbicide) will lessen overall environmental impacts.

Comment: *An individual from the Confederated Tribes of the Warm Springs Indian Reservation had concerns that Bonneville had incessant intrusions upon the reservation lands; the cumulative effects of all activities was disruptive to their lifestyle and may negatively impact the cultural value of tribal lands. [#31]*

Response: Thank you for voicing your concerns. We hope that engaging the Tribes in the planning processes for managing our facilities that cross your Reservation will address Tribal concerns and issues and help alleviate overall negative impacts. Chapter III (Planning Steps, 2. Identify Surrounding Land Use and Landowners/Managers) has steps for working on Tribal Reservations.

Comments and Responses to Agencies, Organizations, and Individuals to Whom the EIS is Sent

Comment: *Page 235, Benewah County should receive a copy. (Idaho) [#1]*

Comment: *State Historic Preservation Offices [SHPOs] need to be on mailing lists. Tribal Historic Preservation Officers (THPOs) with facilities on their reservations, or off-reservation ceded and/or traditional use areas need to be on mail lists. [#13]*

Comment: *Page 232, under Department of Energy: Delete Battelle Labs, replace with Pacific Northwest National Laboratory. Delete Hanford, replace with: Richland Operations Office. Add Idaho Operations Office.*

Page 233: Add Wanapum People to list of Tribal Governments.

Page 234: Under Washington, add the Department of Fish & Wildlife

Page 237: Should the Benton County PUD be added to the list of Electric Utilities?

Page 240: Include Tri-City Herald and Spokane-Spokesman Review. [#22]

Response: The changes have been made; thank you.

Comments and Responses to Glossary and Acronyms

Comment: *Page 275, definition of T&E. Add NMFS after USFWS. [#1]*

Response: Thank you for bringing this omission to our attention. The definition has been corrected.

Comments and Responses to References

Comment: *Page 250: If information is used, add DOE 1999. Hanford Comprehensive Land-Use Plan Environmental Impact Statement, DOE/EIS-0222F. [#22]*

Response: Thank you. We feel that this plan will be very useful in site-specific analysis/planning for rights-of-way across Hanford. Because it will be used on a site-specific bases and not in this program-wide document, we did not add it as a reference for this document.

Comments and Responses to Appendices

FS Mitigation Measures and Background

Comment: *USFS to FS: A small item but isn't the USFS abbreviation incorrect and really should be either USDA-FS or just FS. [#36]*

Comment: *COMMENTS TO APPENDIX "F": USFS MITIGATION MEASURES AND BACKGROUND Page F-1: The reference on that page to BLM (middle of page) is inaccurate. The sentence should be revised to read: "These mitigation measures were developed based on current USFS Land and Resource Management planning documents." [#39]*

Response: Thank you. The corrections have been made.

Comment: *Page F-2: Second Bullet: Revise to read: "Proposals for herbicide use will be subject to the review, and either concurrence or approval, by an authorized Forest Officer." [#39]*

Response: Thank you; the revision has been made.

Comment: *Use of Herbicides: 1) Lolo National Forest Noxious Weed FEIS and Lolo Forest Plan Amendment 11 contains many mitigation measures for use of herbicides on Lolo National Forest. These requirements will need to be incorporated into any spray project proposals which will occur on the Lolo. I would suggest a copy of*

Amendment 11 be forwarded to BPA for inclusion into their planning documents if this has not already been done. [#36]

Response: This is a good example of the type of information that needs to be used in developing or updating right-of-way management plans with the Forest Service for corridors crossing FS-managed lands. As you mentioned, in this circumstance the mitigation measures for use of herbicides on Lolo National Forest should be incorporated into any spray project proposals for Bonneville corridors crossing these lands. Your comment will be forwarded to the Natural Resource Specialist in charge of Bonneville vegetation management activities in your area.

Comment: *Please change the mitigation measure on page F-2 of Appendix F to read, "When seeding, use native species unless the use of non-native species is approved. The appropriate Forest Service Line Officer must approve all seeding mixtures in advance. Consider topping trees as an alternative to felling." [#32]*

Response: Thank you; the change has been made.

Comment: *Also, DEIS Appendix F does not contain all of the mitigation measures found in Lolo Forest Plan Amendment 11. [#36]*

Response: We apologize if not all of the mitigation measures found in the Lolo plans are included in the Appendix; we recognize that they will need to be considered for site-specific vegetation projects. The Appendix is a tool to be used to help recognize and anticipate issues that may need to be addressed and documents that may need to be consulted for site-specific projects on Forest Service lands. It does not replace the need to work with the appropriate Forest when proposing vegetation management activities. The appendix is not all-inclusive, and is not meant to be, because the target is always moving — new Forest service plans are being developed, noxious weed EISs are being finalized, and so on. That is one reason that this information is in an Appendix for this EIS — because we did not want to "outdate" the Bonneville Vegetation Management EIS as soon as it was published.

Comment: *Page F-1: Fourth Paragraph under "Mitigation Measures Specific to the USFS": Revise the paragraph to read: "These mitigation measures will be used in reviewing, updating (as*

Public Comments and Responses

necessary) and developing site-specific vegetative management plans for BPA's facilities located on National Forest System lands. Additional measures may be used to adequately mitigate site specific environmental effects or concerns"

Page F-6, F-7: Recommend that the definitions of "Standards and Guidelines" be moved from Page F-7 and more appropriately be placed in front of all of the planning documents listed on these two pages, just prior to the list beginning with "Forest Plans". Standards and guidelines are common terms used in nearly all land and resource management planning documents. Placing the definitions of these terms as written makes it appear that they (the definitions) are applicable only to their use in the Interior Columbia River Basin Draft EIS's/Appendices. [#39]

Response: Thank you for the suggestions. Changes to this effect have been made.

Comment: *Page F-15, Third Bullet: We can't emphasize enough the importance of this bullet statement with respect to vegetative management activities on National Forest System lands. The statement: "Site specific analysis is needed for all projects" appears here under the "Wildlife and Fish" section of these Mitigation Measures. However, this is a statement that should more appropriately be stated elsewhere in Appendix F, to make it (a) direction applicable to ALL of the BPA's vegetative management activities on NFS lands. We recommend that at the very beginning of Appendix F, language be included which states the following: "Site-specific vegetative management plans, developed in accordance with the standards and guides of this programmatic EIS, should be developed by Program Managers in advance of implementing vegetative management activities on NFS lands. Existing vegetative management plans should be reviewed and revised, if necessary, to make them consistent with the Record of Decision and selected alternative of this EIS". [#39]*

Response: This statement regarding site-specific analysis through the development of vegetation management plans is stated in Chapter III. We have reiterated that statement in the appendix, as suggested.

Comment: *Herbicides and herbicide formulations: In Planning Step 2 (Identify Surrounding Land Use and Landowners/Managers), project*

managers are instructed to review site-specific vegetation management plans for consistency with both U.S. Forest Service and U.S. Bureau of Land Management mitigation measures, which are specified in Appendices F and G of the DEIS. Appendix F lists eight herbicide active ingredients that are approved for use by both USFS and BPA. Experience with USFS vegetation control in Oregon and discussions with USFS personnel indicate that only four herbicide active ingredients (glyphosate, picloram, dicamba, and 2,4-D) may be used in Oregon for any type of vegetation control on USFS lands. These herbicide restrictions result from the Mediated Agreement between the Northwest Coalition for Alternatives to Pesticides, the Secretary of Agriculture, and Oregonians for Food and Shelter (May 24, 1983). Similarly, Appendix G lists 20 active ingredients or combinations that are approved for use in vegetation control by both BLM and BPA. A footnote to this list indicates that throughout all of Oregon, herbicides may only be used for noxious weed control. Experience with BLM vegetation control in Oregon and discussion with BLM personnel confirms that throughout all of Oregon herbicides may only be used for noxious weed control. Only four active ingredients (glyphosate, picloram, or dicamba, and 2,4-D) or combinations (2,4-D plus glyphosate, picloram, or dicamba) may be used in Oregon on BLM lands. While these latter restrictions are stated on page G-2 of the DEIS, other comments by BPA about eastern Oregon restrictions are misleading. We recommend that project leaders carefully review these herbicide restrictions with USFS and BLM personnel as part of Planning Step 2, and that the Final Environmental Impact Statement reflect USFS and BLM policies more accurately. [#40]

Response: Thank you for noting the potential inconsistencies. We have reviewed the lists and made changes. Also, please note that the appendices are tools to help recognize and anticipate issues that may need to be addressed and documents that may need to be consulted for site specific projects on Forest Service or BLM lands. They do not replace the need to work with the appropriate Forest or district when proposing vegetation management activities for decisions such as determining appropriate herbicides to be used. The appendix is not all-inclusive, and is not meant to be, because the target is always moving — new Forest service plans are being developed, noxious weed EISs are being finalized, etc. That is one reason that this information is in an Appendix for this EIS — because we did not want to outdate the Bonneville Vegetation Management EIS with old data as soon as it was published.

Comments and Responses to Other Topics Related to this EIS

Comment: *I have read through the DEIS and have no problems with it. [#10]*

Response: Thank you for your comment.

Comment: *I would appreciate a look at the final proposal when completed or any other documentation that may come up regarding noxious weed control on BPA ground. [#10]*

Response: You will be on our mail list to receive the final EIS.

Comment: *Several times the Neitzel 1999 report was mentioned in our comments. A hard copy of the report will be sent to your office, however, it can also be accessed at : <http://www.hanford.gov> [#22]*

Comment: *A copy of the Hanford Comprehensive Land Use Plan EIS, DOE/EIS-0222F, also mentioned in our comments was sent to Tom McKinney at the Portland office. [#22]*

Response: Thank you.

Comment: *An individual from the Confederated Tribes of the Warm Springs Indian Reservation expressed appreciation for Bonneville's active role in practicing good stewardship of natural resources. [#31]*

Response: Thank you.

Copies of All Letters Received

The 38 comment letters, emails, phone calls, and public meetings received on the Draft EIS are reprinted on the following pages. Each comment is given a unique identifying number that begins with the letters TVM (transmission vegetation management).

<u>Log No.</u>	<u>Name</u>	<u>Affiliation/State</u>
TVM-001	Larry Cooke	US Department of Agriculture, Washington
TVM-002	Matt Voile	Umatilla County Weed Control, Oregon
TVM-003	[Log No. Error]	
TVM-004	[Log No. Error]	
TVM-005	H.E. Brooks	
TVM-006	Larry Purchase	BPA
TVM-007	Jack Triepke	Murphy Lake Weed Crew, Montana
TVM-008	Rikki Osborn	Idaho
TVM-009	Kim Antieau	Washington
TVM-010	Kevin L. Hupp	Lincoln County Noxious Weed Control Board, Washington
TVM-011	Jay Neil	Pacific Power and Light, Oregon
TVM-012	Mary Kay Leitka	Hoh Tribal Member, Washington
TVM-013	[NA]	Colville Confederated Tribes Vegetation Management Program Meeting Notes
TVM-014	Michelle Stevie	Squaxin Island Tribe, Natural Resources Department, Washington
TVM-015	Lenora A. Oftedahl	Washington
TVM-016	Roy Berger	US Department of the Interior, Fish & Wildlife Service, Idaho
TVM-017	[Log No. Error]	
TVM-018	David Radtke	Oregon
TVM-019	Logan A. Norris	Oregon State University, Forest Science

Public Comments and Responses

TVM-020	Sandy Daniel	Panhandle Weed Management Area Steering Committee, Idaho
TVM-021	Kimberly Grigsby	Oregon Department of Fish & Wildlife, Habitat Division
TVM-022	Paul F. X. Dunigan, Jr.	US Department of Energy, Richland Operations Office, Washington
TVM-023	duplicate copy of #21	
TVM-024	Robert L. Vaught	US Department of Agriculture, Forest Service, Colville National Forest, Washington
TVM-025	Bruce Buckley	Oregon
TVM-026	Caryn Miske	Alliance for the Wild Rockies, Montana
TVM-027	Terri Horness	Oregon
TVM-028	Dan Wallermeyer	Skamania County Noxious Weed Control Board, Washington
TVM-029	John Phipps	Mt. Baker–Snoqualmie National Forest, Washington
TVM-030	[NA]	Public Comments – 9/15/99 Public Meeting, Oregon
TVM-031	[NA]	Public Comments – 9/29/99 Affiliated Tribal Meeting
TVM-032	Scott D. Conroy	US Department of Agriculture, Forest Service, Modoc National Forest, California
TVM-033	Darrel L. Kenops	US Department of Agriculture, Forest Service, Willamette National Forest, Oregon
TVM-034	Richard E. Sanderson	US Environmental Protection Agency, Office of Federal Activities, Washington, DC
TVM-035	[Log No. Error]	
TVM-036	Fred Haas	US Department of Agriculture, Forest Service, Plains/Thompson Falls Ranger District, Montana

TVM-037	Terry Roberts	Governor's Office of Planning & Research, California
TVM-038	Paul Hiebert	Idaho Panhandle National Forest
TVM-039	Jack L. Craven	US Department of Agriculture, Forest Service, Washington, DC, Office
TVM-040	Preston A. Sleeper	US Department of the Interior, Office of the Secretary, Oregon
TVM-041	Marcia Cross	The Confederated Salish and Kootenai Tribes of the Flathead Nation, Montana
TVM-042	Elwood Miller, Jr.	The Klamath Tribes, Oregon

Public Comments and Responses

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BPA Public Involvement

From: Larry Cooke [larry.cooke@wa.usda.gov]
Sent: Thursday, August 12, 1999 2:07 PM
To: comment@bpa.gov
Subject: deis transmission vegetation

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: TSVMD01-001
RECEIPT DATE: AUG 16 1999

Comments:

figure V-2 Vegetation Type, you are showing light green (Majority deciduous) in many places in Eastern Washington and North Idaho. Most are wrong. The major river bottoms are deciduous and the uplands are coniferous. page 118 table V-1 shows white fir in mid elevations of the Blues and North Idaho. This is wrong. White fir occurs in southwestern Oregon page 119, T&E species are listed by both USFWS and NMFS page 161, the buffer widths for NRCS code 391A are national standards used in a general scope. Most States have supplemented this standard to fit their conditions and situations. There can be many widths depending on the circumstances. You should contact each State to obtain the State supplement to the National Standard page 275, definition of T&E. Add NMFS after USFWS page 235, Benewah County should receive a copy

Larry Cooke, Environmental Specialist
316 W. Boone, Suite 450
Spokane, WA 99201
(509) 323-2964
larry.cooke@wa.usda.gov

Transmission System Vegetation Management Program

"I'd Like to Tell You . . ."

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: TSVMD01-002
RECEIPT DATE: AUG 18 1999

- Of the choices offered in the Draft EIS, I prefer: R4; VS3; MA2
BPA needs to keep all possible methods of
"management" available to maintain safe and effective
power production and transport.
- I do not like: The policy that "No action" would be considered
A management action.
- You can improve the choices by: Eliminating all but R4, VS3, MA2
- I have these other comments: Do NOT weaken your position or
stance by accepting any choice but R4, VS3, MA2
- I need more information about: Nothing

(Use back of sheet if you need more room)



Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)

Name: Matt Vail, Supervisor Umatilla County Road Control
Address: 5920 Westgate, Pendleton, OR 97801

Please mail your comments by October 9, 1999 to:



Bonneville Power Administration
Communications Office - KC-7
P.O. Box 12999
3920 Westgate • Pendleton, Oregon 97801 • 97212



BPA Public Involvement

From: hebroids@aep.com
 Sent: Tuesday, August 31, 1999 1:05 PM
 To: comment@bpa.gov
 Subject: Bonneville Power Draft EIS for transmission

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: TVM-005 RECEIPT DATE: SEP 01 1999

I have reviewed the August, 1999 draft. There seems to be adequate unit costs for the various process that tend to lead toward the more cost effective and easier to administer processes. However I feel efficiency which I define as cost divided by time should be the economic evaluation basis. Therefore I suggest the economic evaluation be based on cost per unit per year instead of just cost per unit.

Also, one should look at the cost to maintain the entire system per year instead of cost per unit. Although this may seem to be similar to cost per unit per year, there are differences.

You may wish to consider cycle length and type of cycle in your evaluation. Frequently vegetation on an entire rights of way does not develop at the same rate. However, a utility frequently treats everything as the slower growing vegetation will not wait until the next cycle. We utilize a "just in time" cycle. In this cycle, a vegetative cover type or tree is not worked until actually needed. THIS REDUCES THE COST PER YEAR TO MAINTAIN THE ENTIRE SYSTEM. Cycles within cycles require more intense planning and are trickier to manage but can reduce the frequency of impact for many sites and save money. A just in time cycle also reduces the visual impact to a rights of way.

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Transmission System Vegetation Management Program

"I'd Like to Tell You . . ."

1. Of the choices offered in the Draft EIS, I prefer: _____

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: TVM-006 RECEIPT DATE: SEP 01 1999

2. I do not like: _____

3. You can improve the choices by:

① The Draft EIS is lacking an analysis of the Threatened and Endangered Species. Particularly the effect of applying herbicides along stream banks where Salmon spawn in cool water and are protected by riparian vegetation.

4. I have these other comments:

② An analysis of the new (just now being drafted) Washington State Dept of Ecology's STORMWATER MANUAL (Vols. 1 through 5). How will that document fit in? Notice is attached.

5. I need more information about: _____

(Use back of sheet if you need more room)

☒ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)

Name LARRY PURCHASE (BPA) Ext. 3768

Address _____

Please mail your comments by October 9, 1999 to:

Bonneville Power Administration
 Communications Office - KC-7
 P.O. Box 12999
 Portland, OR 97212



Transmission System Vegetation Management Program

"I'd Like to Tell You . . ."

1. Of the choices offered in the Draft EIS, I prefer: RZ → VS1

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: TVM-002
RECEIPT DATE: SEP 14 1999

2. I do not like: Language written under "Alternative VS1-Noxious Weeds" (p. 5-15) that reads "This alternative would allow us to keep in compliance with controlling noxious weed" when the BPA is not currently in compliance with controlling noxious weeds (e.g., on the Kootenai NF) (for noxious weeds currently designated by the State of Montana).
3. You can improve the choices by:

4. I have these other comments: Noxious weed management ought to have been promoted as a "purpose" (page 5-1) given the impact (existing and potential) that transmission system vegetation management has on plant communities and adjacent lands, as regards noxious weeds. Perhaps earnest noxious weed management is implied in the third purpose: "comply with laws and regulations" (?).
5. I need more information about:

(Use back of sheet if you need more room)

- ☐ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)

Name Murphy Lake Weed Crew (c/o Jack Triepke)
Address Murphy Lake R.S. P.O. Box 116, Fortine, MT 59918

Please mail your comments by October 9, 1999 to:
Bonneville Power Administration
Communications Office - KC-7
P.O. Box 12999
Portland, OR 97212



BPA Public Involvement

From: Rikki Osborn [rikki_osborn@hotmail.com]
Sent: Friday, September 10, 1999 10:08 AM
To: comment@bpa.gov
Subject: Transmission System Vegetation Management Program

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: TVM-002
RECEIPT DATE: SEP 14 1999

1. Of the choices offered in the Draft EIS, I prefer any methods that give the biggest amount of tools in the tool box. This appears to be R4, VS3, MA2, E1, and NE1. Anytime we can save money on high cost items - especially labor - and still reduce weeds and propagate a plant community of desirable vegetation that will reduce weeds and tall plants, I'm all in favor of it. I believe we can use herbicides to establish this desirable plant community then over time reduce the use of herbicides down to as necessary to combat invasive weeds that have no pathogens or parasites to keep them from spreading rapidly. If the above alternatives are not followed; I would think this would open up enforcement actions by both State and County Noxious Weed Authorities. This would result in fines and the work being done on large scale treatment and large amounts of herbicides which may or may not be on your approved list.

2. I do not like the use of "Environmentally Preferred Alternative". This reference is not in the best interests of long term vegetation management. Invasive weed species without their natural parasites or pathogens from their original homeland love to flourish in these areas. Uncontrolled rapid growth of exotic weeds is not in the best interests of the environment. A do nothing approach as suggested by anti herbicide groups is definitely anti environmental.

3. You can improve the choices by being scientific and not giving in to public action groups that claim to be "Environmental".

4. I would like to see consideration given to native vegetation to propagate your plant community, not just low growing grasses and forbs from where-ever. I think consideration should be given to pressure washing all vehicles and equipment that enter your Right of Way especially from other weed infested sites. This should be done with the view of washing radiator and under carriages where seeds and plant fragments hide.

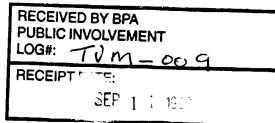
5. No Comment

Rikki Osborn
Rt. 1 Box 116P
Lenore, ID 83541

Get Your Private, Free Email at <http://www.hotmail.com>

BPA Public Involvement

From: kim antieau [kantieau@hotmail.com]
Sent: Tuesday, September 14, 1999 8:55 AM
To: comment@bpa.gov
Subject: transmission system vegetation management program



September 11, 1999

Dear BPA:

I was quite distressed upon reading your "transmission system vegetation management program." I am appalled that you are proposing (and probably already using) herbicides with a toxicity category II, III, and IV!

These same herbicides are carcinogenic, teratogenic, mutagenic, and effect reproduction. (2,4-D is notorious for causing problems.) And you are actually proposing to use aerial spraying of some of these toxic chemicals?

As a government agency, you should be protecting us. Those of us who live in Skamania County are already bombarded by pesticides from the county, the state, Southwest Washington Health District, PUD, the railroad, gas lines, plus what private citizens spray. I am against any use of herbicides. Of course I understand the need to keep down vegetation but you have better, safer means. If you decide you must use herbicides (which

I stronger protest), aerial and broadcast spraying should absolutely be banned from the program. You must consider the health of the entire ecosystem, of which we are a part. You are not the only ones using pesticides. Please keep that in mind.

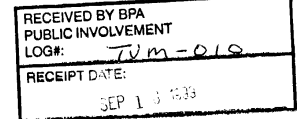
Sincerely,

Kim Antieau

Get Your Private, Free Email at <http://www.hotmail.com>

BPA Public Involvement

From: Kevin Hupp [khupp@co.lincoln.wa.us]
Sent: Thursday, September 16, 1999 10:22 AM
To: comment@bpa.gov
Subject: DEIS COMMENTS



To Whom it May Concern:

I have read through the DEIS and have no problems with it.

I am glad to see your continued hard-line approach to controlling noxious weeds.

I am also pleased to see your proposal to use Bio-control and Herbicides for these noxious weeds.

I am most happy to see your continued supply of herbicides and biocontrol to landowners who have land where power lines travel through.

I would appreciate a look at the final proposal when completed or any other documentation that may come up regarding noxious weed control on BPA ground.

Sincerely,

KEVIN L. HUPP, COORDINATOR
 LINCOLN COUNTY NOXIOUS
 WEED CONTROL BOARD
 PO BOX 241
 DAVENPORT, WA. 99122
 (509 725-3646
 <NOXIOUSWEEDS.COM>

Kuehn, Virginia (Ginny) -KCC-7

From: Jay. Neil@PacifiCorp.com
Sent: Friday, September 17, 1999 7:21 AM
To: Kuehn, Virginia (Ginny) -KCC-7
Subject: External Generic (NOTA) information request

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: TVM-011 RECEIPT DATE: SEP 1 1999

NOTE: A copy of what the sender submitted on the form was e-mailed back to them.

Submitter: Jay Neil

Their e-mail address: Jay. Neil@PacifiCorp.com

Date Submitted : 9/17/99 7:20:49 AM

Their address:

Pacific Power and Light
attn: Jay Neil
1247 Montgomery St. SE
Albany, OR. 97321

Their telephone: (541)967-4464

Their request or Comment:

In last night's Albany Democrat-Herald, there was a statement that BPA was seeking comments on your vegetation management program. I am a Forester with Pacific Power and Light and what I would love to see you folks do is to start notifying property owners when your crews are coming through a right-of-way performing vegetation management work. We receive many irate calls every year here at Pacific Power from customers who think that work that was done by your crews was done by us. We end up having to go out and investigate each of these calls which costs us a good bit of time. Your Vegetation Management Department could certainly improve your communications with your "neighbors" so that these folks know who to contact with their questions and/or concerns.

Technical web information on submitter.

Page they were on before submitting form: Manually entered URL or retrieved page from disk cache.

The IP address user is at: 205.188.193.29

The screen resolution of their browser (Width x Height): 640 480

The type of browser used: Mozilla/4.0 (compatible; MSIE 4.01; MSN 2.5; AOL 4.0; Windows 98)

1

BPA Public Involvement

From: Mary Leitka [maryleitka@hotmail.com]
Sent: Wednesday, September 15, 1999 8:26 AM
To: comment@bpa.gov
Subject: BPA

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: TVM-012 RECEIPT DATE: SEP 1 1999

TO: BPA
FROM: Mary Kay Leitka

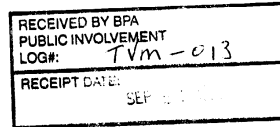
I am a Hoh Tribal member from the State of Washington and I am also a cultural teacher. I teach the traditional weaving of the coastal Indian throughout the Pacific Northwest. I attended a conference in Reno on June, 1999. During the Californai Basketweavers conference I was on a panel with the Chief of Bureau of Land Management, Department of Fisheries and Forestry from Washington D.C. The weavers was presented with a draft administrative rules concerning the gathering sites and permits to gather. I told the parties on the panel that I felt it was a violation of my treaty right to gather where we have always gathered as stated in the treaty. I also stated that I do not believe that tribal council can change my treaty right and any agreement that is signed should have be reviewed by the traditional Indian people. I have been on the tribal 21 years before I resigned in 1998, so I know all of the administrative rules that the government can present only to the council and not the people. I have reviewed your draft and I was wondering if you have contacted the tribes that are in the area for any review about the use of herbicides. I think that the statement on the draft is very important and BPA should really take into consideration the Indian people and use of the materials throughout the country. "Intergrated Vegetation Management (IVM) is a strategy to cost-effective control vegetation with the most benign overall long-term EFFECT ON PUBLIC HEALTH AND SAFETY AND THE ECOSYSTEM. I was told by my mother that it is important to protect everything in our circle of life because one thing depends upon the other, everything on this earth has a purpose. As a traditional weaver and teacher I would oppose to the of any herbicides because of not knowing the effect on plants, animals, water, roots, and materials used for weaving. I think that it very important for the agencies to deal with the methods appropriately and with respect not only for Mother Earth but also the people. I would like to be informed of any hearings that will be held in the Aberdeen area so that I can attend.

Mary Kay Leitka

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1

Colville Confederated Tribes
Vegetation Management Program DEIS Meeting Notes
9/7/99



Attendees:

Adeline Fredin – Tribal Historic Preservation Officer
Joaquin Cleveland – Vegetation Management Officer
Bob Shank – BPA Tribal Liaison
Hope Pennell – BPA Cultural Resources
Stacy Mason – BPA EIS Project Coordinator

Tribal fishing, hunting, and plant gathering areas extend much farther than reservation boundaries, and include the **traditional use areas** of the twelve tribes comprising the Colville Confederated Tribes. Because the Tribes retain rights in ceded and traditional use areas, Tribal representation on ROW Management plans developed for off-reservation areas used by the Tribes (in addition to management plans for the reservation) are necessary. Snoqualmie Pass, Moses Lake, Stevens Pass are some examples of CCT gathering areas. Some of the plants that are gathered annually by Tribal members include huckleberry, elder berry, mushrooms, willows, a variety of celery's, potatoes, carrots, camas root, bitter root etc.

We should have the opportunity to represent our interests in areas that are traditional (Colvilles did not sign any document abdicating their rights). [Will send Bonneville a map of Colville's traditional use areas.]

Spiritual values of **burial sites** must be considered as well as managing ancestral remains. Although you may not disturb the ground, herbicide spraying above the ground may impact spiritual value. If lines cross burial sites, some tribal members would not like herbicide used on those sites – others might want herbicide use if it controls knapweed.

It is a federal responsibility to identify and avoid burial sites if present. Even if identified, burial sites are not always managed respectfully. To better ensure burial sites aren't impacted during vegetation control activities, burial site locations should be recorded in a database so information is retrievable and accessible to managers prior to issuing work contracts.

Concerns with **weeds along all access roads** – they need to be treated. Sometimes access roads are owned by the county or others, and used by Bonneville and no one takes responsibility for treating weeds.

slm9/21/99

Regarding washing vehicles to prevent spread of weeds/seeds -- If there is a concern with washing vehicles with power washers (oils, metals) use an airgun to blow off noxious weeds.

SHPO's need to be on **mailing lists**.

THPO's, with facilities on their reservations, or off-reservation ceded and/or traditional use areas need to be on mail list.

Confederated Tribes of the Colvilles includes:

Wenatchee;
Moses;
Chelan;
Entiat;
Methow;
Okanogan;
Nespelem;
Sanpoil;
Lakes;
Colville;
Palouse; and
Chief Joseph Band of Nez Pierce

Regarding need for **formal consultation** – Bonneville will get back to Adeline and Joaquin on how we plan to address their comments, decide then if they need to review a draft of EIS before going Final, or if consultation more appropriate at the implementation stage.

This is an opportunity for weeds to be managed together with cultural resource and traditional use area management.

slm9/21/99



SQUAXIN ISLAND TRIBE

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG# <i>76m-014</i>
RECEIPT DATE: <i>SEP 15 1999</i>

Bonneville Power Administration
Communications Office
P.O. Box 12999
Portland OR 97212

September 15, 1999

Stacy Mason,

The Squaxin Island Tribe appreciates the opportunity to review and comment on BPA's Vegetation Management Program. As land and fisheries managers we are currently faced with many controversial issues. Several issues of concern include salmonid health, the preservation of fish habitat and water quantity and quality. In light of the Endangered Species Act and the numerous proposed listings for wildlife and salmonid species, it has become essential for managers to lessen the environmental impacts of their activities.

After careful review of the proposed Vegetation Management Program draft EIS we feel that the proposal is biased towards the use of herbicides rather than manual or mechanical forms of vegetation control. The Tribe advocates the use of manual and mechanical methods as well as the planting of low growing native plant species. While the Tribe does not oppose the use of pesticides, we recommend that pesticides only be used as a last resort when other strategies have failed or are impractical. The Tribe does not support the introduction of non-native biological control species.

All of the pesticides listed in the BPA proposal are restricted for use in or near water and/or wetlands. Several of the pesticides are toxic to fish and have the potential to cause ground water contamination. **All pesticides toxic to aquatic life and subject to soil leaching should be prohibited from further use.** These chemicals include but are not limited to: triclopyr, trifluralin, pendimethalin, dimethylamine (2,4D), benefin, bromacil, halosulfuron-methyl, hexazinone, and picloram.

The management proposal does not address buffers on streams and wetlands. We have concerns about the protection of these critical areas and recommend the following: pesticides should not be used in areas associated with water or riparian/wetland vegetation. Rashin's 1992 study on aerial application of pesticides showed that pesticides were detected in streams following application on all the study sites monitored, thus being out of compliance with label requirements. The study recommended that a 90 meter buffer be applied along flowing streams. Manual and mechanical applications typically are at higher concentrations and droplet size of drift is also larger. These applications need careful monitoring to ensure that herbicides are not entering buffer areas and water.

If pesticides are applied we recommend that a minimum 250 foot buffer be applied along all streams and wetlands and that drift into buffer areas be prohibited. Stream and wetland buffers provide many functions and by allowing herbicides to enter these protected areas certain functions are lost.

NATURAL RESOURCES DEPARTMENT / S.E. 3100 Old Olympic Hwy. Box 3 / Shelton, WA 98584
FAX 426-3971 / Phone (360) 426-9783

BPA Vegetation Management Program
Page 2

Another concern is the identification and location of streams and wetlands. What methodology is used to detect these areas? During Rashin's pesticide study it was noted that not all stream channels were identified prior to pesticide application. Methods to identify flowing water included aerial viewing and road crossings. We suggest that all streams and wetlands be field verified and their buffers flagged prior to any maintenance activity.

Program Alternative Recommendations:

Right of Way Program

The Tribe supports the use of low growing vegetation to out-compete other plant communities as a way of controlling undesirable plant species. We recommend seeding only native and preferably indigenous plant and grass species. Using native/indigenous species which are climatically adapted to geographic areas raises the survivability rate and helps control the introduction of non-native/noxious weed species. Studies have also shown that native, indigenous plant species provide higher food values to animals species adapted to these regions.

For vegetation control we support the use of mechanical and manual methods. Soil disturbance can be kept at a minimum by raising mower heights as well as using vegetation species which do not require maintenance. When controlling noxious weeds many mechanical and manual methods can be very successful. We support utilizing these methods for primary control and the use of pesticides only in extreme circumstances.

Electric Yard Program

If ground cloths that help prohibit plant growth can be utilized in these areas it would reduce the need for maintenance as well as the use of pesticides.

Non Electric Program

It is preferable that landscaping utilize native plants to reduce the use of pesticides, fertilizers and water resources. Landscaping with native plants is aesthetically pleasing, virtually maintenance free, and requires no fertilizers and less irrigation.

Please continue to keep us informed, we look forward to your response to our recommendations. If you have any questions please contact me at 360-426-9783.

Sincerely,

Michelle Stevie
Michelle Stevie
Habitat Biologist

B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Transmission System Vegetation Management Program

"I'd Like to Tell You . . ."

RECEIVED BY BPA PUBLIC INVOLVEMENT TVM-015
RECEIPT DATE: SEP 23 1999

1. Of the choices offered in the Draft EIS, I prefer: herbicide - spot and localized for noxious weeds only. I would vastly prefer a hedgerow approach where low growth vegetation is promoted to limit destruction of fish & wildlife habitat
2. I do not like: any kind of broadcast or aerial application of poisons of any kind.
3. You can improve the choices by: employing full time staff to do vegetation maintenance along rights of way. Employ people rather than poison to control plants.
4. I have these other comments: We need to keep as much green stuff as we can in a number of species, not just grass. Also if wildlife is allowed in the R.O.W. they will help inhibit plant growth to some degree. Over for more →
5. I need more information about: _____

(Use back of sheet if you need more room)

☒ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)

Name Lenora A. Oftedahl
Address 2814 NW 108th St Vancouver WA 98685

Please mail your comments by October 9, 1999 to:

Bonneville Power Administration
Communications Office - KC-7
P.O. Box 12999
Portland, OR 97212



Debris should be composted.
If you don't kill the plants but cut and prune you won't have a revegetation question.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Snake River Basin Office, Columbia River Basin Ecoregion
1387 South Vinnell Way, Room 368
Boise, Idaho 83709

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>Tvm-016</i> RECEIPT DATE: <i>SEP 2 1999</i>
--

September 13, 1999

Stacy Mason, Project Manager
Department of Energy
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

Subject: Draft Environmental Impact Statement (DOE/EIS-0285) for the Transmission
System Vegetation Management Program
File #501.0000

Dear Ms. Mason:

We have reviewed the subject document, and have the following comments. We recommend that you conduct detailed ground surveys for listed plant species, particularly *Spiranthes diluvialis* (Ute ladies'-tresses) along the South Fork of the Snake River in eastern Idaho, prior to implementing any form of vegetation management in areas where this species is known to occur or areas that support potential habitat for this species. If this species is found in the project area, efforts to avoid impacts to *S. diluvialis* should be pursued.

Please contact Edna Rey-Vizgirdas of my staff at (208) 378-5259 if you have any questions regarding this matter.

Sincerely,

Edna Rey-Vizgirdas
Acting Supervisor, Snake River Basin Office

David Radtke
PO Box 244
Yachats OR 97498
541 547-3087

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>Tvm-018</i> RECEIPT DATE: <i>OCT 04 1999</i>

September 12, 1999

BPA
Communications Office KC-7
PO Box 12999
Portland OR 97208

Subject: Comments on Draft EIS for the BPA transmission system Vegetation
Management System

In the Siuslaw Forest, Waldport Ranger District, a major north-south BPA transmission line cuts a swath about 300 yards wide through areas of timber that will never be cut again under the National Forest Plan. These areas used to be sprayed with herbicides, creating a grassy meadow area miles long.

As we understand the BPA-USFS agreement, these transmission right-of-way areas were supposed to be managed for "wildlife". Keeping the areas in a brush cycle now does not accomplish this earlier objective. We would like the BPA and USFS to honor their past agreement by keeping the areas in a grassy meadow condition. This would provide an alternative for wildlife such as deer and elk, etc. to the older forests surrounding these transmission lines. Could the BPA and USFS return to controlling brush (by mechanical or manual means) for grassy growth?

David Radtke
David Radtke

Hans Radtke
HANS RADTKE

Kuehn, Virginia (Ginny) -KCC-7

From: Mason, Stacy L. - KECP
Sent: Tuesday, October 05, 1999 2:30 PM
To: Kuehn, Virginia (Ginny) -KCC-7
Subject: FW: Draft EIS

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>TVm-019</i> RECEIPT OCT 05 1999

Ginny -

If it hasn't already, the comment below from Logan Norris needs to be added into the Transmission System Vegetation Management EIS comment log.

thanks
 stacy x5455

-----Original Message-----

From: Powers, Eric N. - KECN
Sent: Tuesday, October 05, 1999 1:55 PM
To: Mason, Stacy L. - KECP; Beraud, Bob - KECN; Graetzer, Inez - KECN
Subject: FW: Draft EIS

I believe this comment belongs to you Stacy.

-----Original Message-----

From: Logan A. Norris [mailto:norrisl@FSL.ORST.EDU]
Sent: Tuesday, October 05, 1999 1:52 PM
To: ea_coordinator@bpa.gov
Subject: Draft EIS

I have reviewed the draft EIS on vegetation management. It incorporates the concepts of integrated vegetation management, making use of a variety of approaches to achieve the vegetation management goals of your program. In my opinion it takes a balanced and scientifically sound approach to the issues involved. Based on my personal scientific and technical knowledge, I believe the use of a combination of the chemical, mechanical and manual methods outlined in the EIS will be effective and can be carried out with little or no adverse environmental impact or impacts on the health of humans.

Logan Norris, Ph.D.
 Professor of Forest Science
 Oregon State University

BPA Public Involvement

From: Sandy Daniel [sdaniel@co.kootenai.id.us]
Sent: Monday, October 04, 1999 3:33 PM
To: 'comment@bpa.gov'
Cc: 'ggibson@uidaho.edu'
Subject: BPA response

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>TVm-030</i> RECEIPT OCT 05 1999



BPA response.doc

Attached is the comment form for the BPA Transmission System Vegetation Management Program Draft EIS. We appreciate the opportunity to comment.

Your EIS was reviewed by the Panhandle Weed Management Area Steering Committee. This group is formed of federal, state and local agency folks, as well as private citizens, and others with an interest in noxious weed control. The purpose of the group is to "erase" jurisdictional boundaries and work toward the common goal of noxious weed control and eradication. The PWMA covers the five northern counties of Idaho; Spokane and Pend Oreille Counties in Washington; Lincoln, Sanders, and Mineral Counties in Montana; and the East Kootenai District of British Columbia.

The Steering Committee voted unanimously to support BPA's preferred alternative for vegetation control. One caveat was voiced, however, that it will be important to monitor the treatment and effectiveness over a long period of time. At first blush, it appears BPA is hoping to decrease manhours and costs in annual treatments after the initial emphasis period. While such a goal can be realized, the fact is that noxious weeds can move in quickly without constant watchfulness to ensure they don't. In other words, don't turn your back after 5 years, hoping the good control you've achieved is all that needs to be done.

Thank you again for the opportunity to comment. Please let us know if we can be of assistance. Partnering to control these invaders is the best way to ensure success.

Sandy Daniel
 Vice-Chair
 Panhandle Weed Management Area

Transmission System Vegetation Management Program

"I'd Like to Tell You..."

1. Of the choices offered in the Draft EIS, I prefer: We agree with the Bonneville Power Administration preferred alternatives.

2. I do not like: _____

3. You can improve the choices by: _____

4. I have these other comments: The Panhandle Weed Management members urge you to consider scheduled visits to the sites to ensure undesirable vegetation, and particularly noxious weeds, are controlled after your emphasis period is completed. Noxious weeds, because of the longevity of viable seed, can quickly take over these sites even though you may have actively controlled the area for 5 years. Long-term monitoring will be required.

5. I need more information about: _____

☐ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)

Name _____
Address _____

Please mail your comments by October 9, 1999, to:

Bonneville Power Administration
Communications Office - KC-7
P.O. Box 12999

BPA Public Involvement

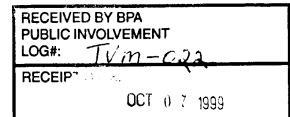
From: Annabelle_L.Rodriguez@RL.gov
Sent: Wednesday, October 06, 1999 2:07 PM
To: comment@bpa.gov
Cc: Paul_F_Jr_Dunigan@apimc01.rl.gov; Annabelle_L_Rodriguez@apimc01.rl.gov
Subject: U.S. DOE - Richland Operations Office Comments on Transmission System Vegetation Management DEIS

Attached are the comments from the Richland Operations Office. Thank you for giving us the opportunity to comment.

Several times the Neitzel 1999 report was mentioned in our comments. A hard copy of the report will be sent to your office, however, it can also be accessed at: <http://www.hanford.gov>

A copy of the Hanford Comprehensive Land Use Plan EIS, DOE/EIS-0222F, also mentioned in our comments was sent to Tom McKinney at the Portland office. However, if an additional copy is needed please call me at the phone # below or email at: annabelle_l_rodriguez@rl.gov
<mailto:annabelle_l_rodriguez@rl.gov>

Annabelle L. Rodriguez for Paul F.X. Dunigan Jr., RL NEPA Compliance Officer
NEPA
(509) 372-0277



**Bonneville Power Administration Transmission System
Vegetation Management Program
Draft Environmental Impact Statement
(DOE/EIS-0285)**

General Comment –The BPA EIS did a fairly good job in presenting the case but there are a few areas that could be enhanced with a little more detail or thought. In particular, it appears that they have not given the shrub-steppe ecosystem much attention during their analysis but instead dwell mainly on forest system. The reader is supplied with reasonable maps within the document which show the location of transmission lines, but unless I missed it, there was no text on the mileage of the transmission lines in each of the major ecosystems – grasslands, shrub, and forest.

Specific Comments:

1. No text on mileage of transmission lines in each of the major ecosystems within the text.
2. No discussion about partnerships with public and private industries to utilized transmission right-of-ways for compatible uses that would maintain vegetation at optimum heights. Such actions as the berry industry, pulp and paper industry or Christmas tree farming were not reviewed.
3. Vegetation types need to be revised and possibly expanded. Little mention is made of the shrub-steppe ecosystem although BPA on page 117 wants the reader to consider the shrubland ecosystem as containing the shrub-steppe ecosystem. Shrublands according to BPA can be located in high precipitation areas or low precipitation areas and is also Range Land. This classification is not practical and takes in too many independent ecosystems. I feel that the shrub-steppe ecosystem, a low precipitation ecosystem, warrants its own discussion since according to the maps provided, many miles of transmission lines cross this ecosystem type.
4. Figure V-2, Vegetation Types, does not depict the shrubland ecosystem as stated on page 116 of the text.
5. The reader is at a loss as to what BPA will do where transmission lines cross shrubland ecosystems. If no vegetation management will be done in these ecosystems it should be mentioned in the document.
6. BPA failed to review the alternative method of running transmission lines underground through specially constructed cooling system thus eliminating the extensive need for vegetation management.
7. I did not find in the text of the document any discussions on State Sensitive Species, nor did I locate any information on the Migratory Bird Treaty Act.
8. For any actions that may take place on the Hanford Site, BPA must consult the document Biological Resources Management Plan.
9. For any actions on the Overlay Wildlife Refuges on the Hanford Site, BPA must consult with the US Fish and Wildlife Service which manages these lands for DOE-RL.
10. Page 28, last ¶: should *troller* read *roller*?
11. Page 31, 4th ¶: Does this statement mean BPA has also worked with Hanford?
12. Section on Replanting: has replanting been done on the Hanford site?
13. Page 59, last bullet: add "*and the U.S. Department of Energy*"
14. Page 119, Table V-2, see Neitzel 1999.
15. Page 121, last ¶: "...crosses 10 sole-source..." however there are only 9 listed.
16. Page 122, 3rd ¶, sentence 3, clarify Snake River: "...and flows through Idaho and along the Oregon-Idaho border into Washington..."
17. Page 131, **Land Use Section:** Add a Section for the **Hanford Site**. Indicate that "Coordination must be done with DOE, Richland Operations Office and the U.S. Fish and Wildlife Service for actions that take place on the Hanford Site".
18. Page 132, Under **Washington** add a discussion on Federal Lands in Eastern Washington, such as DOE.
19. Page 135, 5th ¶: U.S. DOE also complies with NEPA
20. Page 138, 2nd bullet: add *Confederated Tribes of the Umatilla Indian Reservation*
21. Page 139: see Neitzel 1999
22. Page 164, **Herbicide Impacts:** The Hanford site has a Weed Control Plan. A copy will be provided to BPA.
23. Page 165, **Mitigation Measures:** at Hanford a Cultural Resource Survey is needed before any ground disturbance is done.
24. Page 174, **Mitigation Measures:** Hanford shrub-steppe has not been designated as Critical Habitat, but the State of Washington has classified it as "priority habitat"
25. Pages 184 and 185: Need to include discussion of other federal managed lands (DOE, etc.)
26. Page 187, 5th bullet: To what degree has the notification been done? It appears that it was not done for Hanford, unless receiving the draft was the extent of the notification.
27. Page 195, 6th ¶, 2nd sentence: at the end of the sentence add "*or exposure to downwind draft*". Page 195, last ¶: is "nearby residents" an Environmental Justice concern? Are there lower income people that live closer to the corridors than others?
28. Page 232, under **Department of Energy:** Delete Battelle Labs, replace with *Pacific Northwest National Laboratory*. Delete Hanford, replace with: *Richland Operations Office*. Add *Idaho Operations Office*.
29. Page 233: Add *Wanapum People* to list of Tribal Governments.
30. Page 234: Under Washington, add the Department of Fish & Wildlife
31. Page 237: Should the Benton County PUD be added to the list of Electric Utilities?
32. Page 240: Include *Tri-City Herald* and *Spokane-Spokesman Review*.
33. Page 250: If information is used, add DOE 1999. *Hanford Comprehensive Land-Use Plan Environmental Impact Statement, DOE/EIS-0222F*.



Oregon

John A. Kitzhaber, M.D., Governor

Department of Fish and Wildlife

Habitat Division
2501 SW First Avenue
PO Box 59
Portland, OR 97207
(503) 872-5255
FAX (503) 872-5269
TTY (503) 872-5259
Internet www: <http://www.dfw.state.or.us/>



October 5, 1999

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: <i>JVM-023</i>
RECEIPT DATE: OCT 07 1999

Bonneville Power Administration
Communications Office – KC-7
P.O. Box 12999
Portland, OR 97208

RE: Comments on Draft EIS for the Transmission System Vegetation Management Program

The Oregon Department of Fish and Wildlife (Department) appreciates the opportunity to comment on Bonneville Power Administration's Transmission System Vegetation Management Program. The Department's comments pertain to the vegetation management in rights-of-way, rather than electric yards and non-electric facilities.

The Department generally supports Bonneville Power Administration's (BPA) proposed mitigation measures to reduce the impacts on fish, wildlife and their habitat. However, the Department would request that BPA consider the following changes or additions to those mitigation measures.

First, the Department strongly supports the use of riparian buffer zones and herbicide-free zones described in Tables VI-2 and VI-3. However, due to their high toxicity, the Department requests that BPA refrain from using the following herbicides within 30.5 m (100ft.) of waterways, **regardless of the application method**: 2,4-D (highly toxic to aquatic organisms in some formulations); Benfen (highly toxic to aquatic organisms); Diuron (highly toxic to aquatic invertebrates); Pendimethalin (highly toxic to aquatic organisms); and Trifluralin (very highly toxic to aquatic organisms).

Second, the Department requests that BPA limit use the following herbicides due to the lack of data on the toxicity to fish and/or wildlife: Halosulfuron-Methyl; Imazapyr; and Sulfometuron-Methyl.

Third, the site-specific planning steps for water resources state that "(i)f using herbicides, it may be necessary to leave untreated zones (filter strips) to preclude the possibility of herbicide movement from the application site to adjoining water bodies." (emphasis added) The Department requests that BPA always apply this mitigation measure near adjoining water bodies.

Fourth, the mitigation measures for soils state BPA will "consider reseeding or replanting seedlings on slopes with potential erosion problems." (emphasis added) The Department requests that BPA actually reseed or replant seedlings on slopes with potential erosion

problem (rather than just considering doing so), for slopes with 10 percent of soils exposed.

Finally, the Department requests that BPA consider timing restrictions to reduce impacts on wildlife species in addition to federally listed threatened and endangered species. The state of Oregon has listed several species as threatened or endangered that have not been listed by the federal government. These species include the Arctic Peregrine Falcon (*Falco peregrinus tundrius*), the Kit Fox (*Vulpes macrotis*) and the Wolverine (*Gulo gulo*). The Department has also listed numerous species as "sensitive." Prior to significant vegetation management activities, BPA should contact local Department biologists to discuss timing such activities to avoid unnecessarily impacting these species.

If you have any questions, please contact me at (503) 872-5255, extension 5587.

Sincerely,

Kimberly Grigsby
Special Projects Coordinator
Habitat Division

C: David McAllister, HD, ODFW



United States
Department of
Agriculture

Forest
Service

Colville
National
Forest

Federal Building
765 South Main
Colville, WA 99114
509-684-7000
Fax: 509-684-7280

File Code: 2150

Date: October 4, 1999

BONNEVILLE POWER ADMINISTRATION
COMMUNICATIONS OFFICE - K-7
PO BOX 12999
PORTLAND OR 97212

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: TVM-024 RECEIPT OCT 6 1999

Dear Sirs:

We are responding to your request for comment on your Draft EIS Transmission System Vegetation Management Program. BPA has several transmission lines that cross the Colville National Forest. Many of these rights of ways contain noxious weeds, and we are very concerned that if these infestations are not treated, they will remain a perennial source of reinfestation of adjoining National Forest System lands. For this reason we are supportive of your preferred alternative R4, which approves all methods of control.

However, when planning ROW treatments on the Colville Forest, as well as other National Forest lands in Region 6, I want to remind you that BPA must also comply with the terms of the Mediated Agreement to the EIS Managing Competing Unwanted Vegetation. This document emphasizes prevention activities, but it also restricts the types of chemicals that can be used on National Forest System lands. If you do not have a copy of this document you can obtain one from our Portland Office or from our office in Colville.

When you plan a specific project on the Colville Forest, we are more than willing to coordinate with you and help insure that the terms of the Mediated Agreement, as well as other applicable laws and regulations regarding vegetative treatment on National Forest System lands are followed. Please contact John Ridlington at our Colville office (509-684-7191) if you have further questions or need assistance.

Sincerely,

ROBERT L. VAUGHT
Forest Supervisor

cc: jridlington



Caring for the Land and Serving People

Printed on Recycled Paper



RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: TVM-025 RECEIPT OCT 12 1999
--

BPA F 1210 02
(04-91)
(Previously BPA 1508)

U.S. DEPARTMENT OF ENERGY - BONNEVILLE POWER ADMINISTRATION 800 TELEPHONE LOG

LOG NO.	DATE 10/12/99
TIME	

NAME Bruce Buckley
FIRM (IF APPLICABLE) P.O. Box 535
ADDRESS Waldport, OR 97394

PHONE NO. 541-563-2726	CALL RECEIVED BY GK
---------------------------	------------------------

INFORMATION REQUESTED/COMMENT:
Comment - Vegetation Mgmt. Program

Do to the fact that there are a number of domestic water systems, particularly with the first few towns south of the Alsea River. Don't want to see any herbicide application in those areas. They have a number of surface systems in the area and some wells south of the first few towns.

Thank you for letting me comment.

Alliance for the

PO Box 8731 • Missoula, Montana • 59807
Ph: 406-721-5420 • Fax: 406-721-9917



Wild Rockies

Web: <http://www.wildrockies.org/awr>
Email: awr@wildrockies.org

October, 1999

Bonneville Power Administration
Communications Office
P.O. Box 12999
Portland, OR 97212

Re: Transmission System Vegetation Management Program

Dear Bonneville Power Administration:

On behalf of the Alliance for the Wild Rockies (AWR), I am submitting comments pertaining to the Transmission System Vegetation Management Program DEIS. AWR appreciates the opportunity to participate in this planning process and we support the Administration's effort to control vegetation using means which minimize adverse environmental impacts.

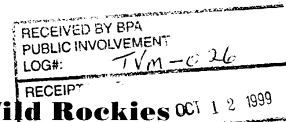
However, AWR is concerned several of the preferred alternatives, especially alternatives, especially the R4/VS3 alternative which would permit Bonneville to utilize broadcast and aerial herbicide treatments, impacting both target and non-target vegetation. Herbicide treatments have caused historic and repeated problems at numerous junctures, including manufacturing, transport, storage, application, dispersal, transformation into other toxic chemicals and disposal. In particular, herbicide applications do nothing to change the conditions which allowed the noxious weeds or other vegetation to establish in the first place, and such applications may leave the soil bare, a condition that favors re-establishment. Therefore, the dependency on toxic chemicals to manage vegetation is difficult to overcome unless it is part of an explicit program to prevent the re-establishment of such vegetation and to eliminate the need to use herbicides in the future.

In addition, the direct effects of numerous herbicides are being found to affect the endocrine systems of both wildlife and humans. This can compromise development, reproduction, behavior, sexual integrity, and immune and nervous system functioning. Furthermore, herbicide use may include the removal of vegetation upon which wildlife species rely, increases in water temperature as vegetation is removed, etc. Finally, the cumulative effect of herbicide applications are difficult to quantify and are not adequately understood.

AWR appreciates the Administration's need to control vegetation. However, based upon the above discussion, the use of chemical control agents should be revisited. More specific comments on the DEIS are provided below.

Biological Control Agents (S-9) - the usefulness of sheep were discounted due primarily to logistics. However, Bonneville could utilize the services of a 3rd party to provide sheep, thereby eliminating logistical problems. The use of sheep should be revisited.

Herbicide Use - the DEIS states that wildlife would not be impacted by herbicide use. Since the direct impacts associated with herbicides are at best uncertain, and will vary depending upon the chemical agent, this statement does not seem well



founded (S-7). Will areas be surveyed in advance to ascertain the presence of organic farming operations (S-7)? Will Bonneville map all right of ways to determine soil conditions, slope, etc. in order to determine whether or not granular herbicides should be prohibited (S-7)?

Reseeding (S-9) - when reseeding is undertaken will native species be used? More specifically, will the Administration select plants that will provide food, hiding cover, thermal cover, nest sites, etc. for grizzly bear, elk, migratory birds and other wildlife?

Alternative MA2 (S-11)- AWR supports this alternative assuming that native plants will be used and habitat improvements will be incorporated into this program. The reliance on spot-herbicide treatments should be minimized or eliminated.

Alternative VS3 (S-16)- if herbicides are used, only noxious weeds and deciduous plants that compete with the low growing plants should be targeted. Using herbicides on any type of vegetation would likely have adverse environmental impacts and should not be undertaken. In particular, the Administration should not use herbicides on plant species consumed by wildlife.

Alternative NE2 (S-17) - the argument for using herbicides is often related to access and cost effectiveness. Therefore, landscaping at non-electric facilities should be readily able to utilize non-herbicide methods to manage noxious weeds.

Corridors (pg. 12-13) - the EIS discusses feathering. However, inadequate analysis is presented as to edge effects, how to minimize such effects, impacts on interior forest. The vegetation management plan for right of ways should consider corridors and their impacts on particular wildlife species in more detail. Although the Administration wants the longest possible maintenance free period, shorter period should be considered if impacts to threatened and endangered species are possible.

AWR supports the MA2 alternative, with a focus on manual and biological control agents. Mechanical methods should be used sparingly, and only where soil conditions and wildlife can readily tolerate such invasive procedures. Herbicides should not be utilized based on the above discussion. However, if such chemicals are used, under no circumstances should broadcast and aerial methods be employed.

AWR appreciates the opportunity to comment on the proposed noxious weed control strategy.

Sincerely,

Caryn Miske
Ecosystem Defense Intern

Missoula Office:

801D Sherwood St. • Missoula, MT • 59802
406-721-5420 • awr@wildrockies.org

Boise Office:

1714 Heron • Boise, Idaho • 83702
208-386-9014 • wildrockies@lesbois.com

Ecosystem Defense Program

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B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

Transmission System Vegetation Management Program "I'd Like to Tell You . . ."

1. Of the choices offered in the Draft EIS, I prefer: _____

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#:	TVM-027
RECEIPT	OCT 12 1999

2. I do not like: _____

3. You can improve the choices by: _____

4. I have these other comments: I would like to see prior notification of exactly when our area will be aerial sprayed. This could be done through newspapers giving us an approximate date of application, and then you supplying us with a hot-line number to call to get a specific date and time (subject to change because of weather) We may have to call more than once as the hot line is updated. This would be so beneficial because we could keep our children in on that particular day and not
~~5. I need more information about:~~ allow them to play outside (especially beneficial for those of us who live very near power lines) We could also move livestock, change out water supplies etc. just for safety measures.

Also, I know you need to be in the growing season for aerial spray, but
 (Use back of sheet if you need more room) over phase

☐ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)
Name Terri HornessAddress 24192 Cox Rd. Rainier OR. 97048

Please mail your comments by October 9, 1999 to:

Bonneville Power Administration
Communications Office - KC-7
P.O. Box 12999
Portland, OR 97212

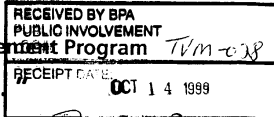


if there is anyway you could spray before apples and berries have been set on (in other words, spray during the bloom stage ^{preferably before} or prior - the ~~or~~ earlier the better) This would greatly reduce any chance of ingesting contaminated fruit by our children (We do have orchards from old homesteads close to power lines where drift could be questionable in my opinion)

Thankyou for putting such a nice informational packet together. While I personally am not too comfortable with aerial spraying, I understand it is least cost, and most effective for you. All that I personally can ask is that you please Keep us informed so that we have the opportunity to use as many safety measures on our behalf as we see fit to protect our families

Transmission System Vegetation Management Program

"I'd Like to Tell You . . ."



1. Of the choices offered in the Draft EIS, I prefer: MA 2 on ROW;
R4, Best Alt.; VS3 Any Veg.; E1, selective
herbicide
2. I do not like: Current noxious weed control or
lack of noxious weed control as currently
practiced in Skamania County (Westend) by
Mr. Jellison of your Olympia Office
3. You can improve the choices by: _____
4. I have these other comments: Your idea of controlling all
vegetation as necessary while establishing
ground cover will prove to be the best
economically and environmentally
5. I need more information about: What low growing species
do you plan to use that will eat -
compete noxious weeds - any suitable
for roadside use?

(Use back of sheet if you need more room)

☐ Please put me on your project mailing list. (You are already on the mail list if you received this in the mail.)
Name Don Wallemberg

Address _____

Please mail your comments by October 9, 1999 to:

SKAMANIA COUNTY
Noxious Weed Control Board
 P. O. Box 790
 Stevenson, Washington 98648

Bonneville Power Administration
 Communications Office - KC-7
 P.O. Box 12999
 Portland, OR 97212



United States
 Department of
 Agriculture

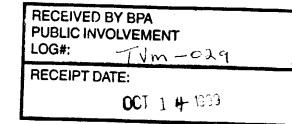
Forest
 Service

Mt. Baker-Snoqualmie National Forest
 21905 64th Avenue West
 Mountlake Terrace, WA 98043-2278

File Code: 2080

Date: October 13, 1999

Ms. Stacy Mason
 Bonneville Power Administration
 Communications Office
 P.O. Box 12999
 Portland, OR 97212



Dear Ms. Mason:

Thank you for the opportunity to comment on BPA's Draft Environmental Impact Statement for your Transmission System Vegetation Management Program (DOE/EIS-0285).

In your Electric Yard Program, we support Alternative E1, because it appears that other alternatives pose a direct threat of electrocution to your maintenance workers.

In your Right-of-way Program, we support Alternative MA2 (Promotion of low-growing plant communities). We support Method Package R3 (herbicides permitted with spot, localized, and broadcast application). We feel that the environmental risks of aerial application of herbicides to non-target species are unacceptable. We support Vegetation Selection VS-1 (herbicides will only be used on noxious weeds). We support the use of alternative methods to control other non-desirable vegetation. Impacts from other methods can be mitigated in various ways (e.g. noise disturbance to T&E wildlife can be timed to avoid their nesting and denning periods).

In your Non-electric Program we support Alternative NE1 if the herbicides will only be used on noxious weeds and not to control other undesirable vegetation. It is unclear from the description if this was your intent since it just mentions "weeds" and not "noxious weeds." If the intent is to use herbicides to control any undesirable vegetation, then we support Alternative NE2.

Please contact us if you would like us to elaborate on the rationale for our preferences described above. Again, thank you for the opportunity to comment.

Sincerely,

JOHN PHIPPS
 Forest Supervisor



(423) 175-9702

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Vegetation Management Draft EIS
Comments - 9/15/99 Public Meeting
 Oregon State Office Building

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>TVM-030</i>
RECEIPT DATE: <i>OCT 14 1999</i>

CommenterComment

- | | |
|----|--|
| 2 | Will BPA allow removal of vegetation along the right-of-way by the general public? |
| 2 | Don't spray any poisons |
| 3 | Plant trees under the lines that don't grow high. |
| 3 | Low-growing is better than herbicides |
| 3 | Fish and animals need protection against herbicides |
| 9 | Vegetation maps - do they show the vegetation types under all the lines? Portland shows-up as agriculture. |
| ? | Like idea of vegetation management alternatives and discussing them with landowners. |
| 6 | Really like your meeting layout and graphics. |
| 7 | What do you do with the trees you cut? |
| 11 | I want to know why (the) Al Gore mandate to sell electric power to aluminum companies reduced rate. I pay for it that through my bill. |
| 11 | Aluminum companies aren't giving much to NW (not many jobs) while we support them. |
| 11 | Aluminum companies nickel and dime the working person |
| 11 | Old plants are gone in a few years anyway. |

ljk/KECN-vegmgnt/pi

Affiliated Tribal Meeting
Comments Received at
Vegetation Management Program DEIS Display Table
 9/29/99

RECEIVED BY BPA PUBLIC INVOLVEMENT LOG#: <i>TVM-031</i>
RECEIPT DATE: <i>OCT 15 1999</i>

- An individual from the Quinalt Tribe had a comment regarding herbicides as they relate to labor; that local labor should be used to control vegetation in lieu of herbicides. Un- or under-employment was unacceptably high on tribal lands.
- An individual from the Warm Springs Tribe had concerns that Bonneville had incessant intrusions upon the reservation lands; the cumulative effects of all activities was disruptive to their lifestyle and may negatively impact the cultural value of tribal lands.
- An individual from the Warm Springs tribe commented that extreme care should be taken to ensure that herbicides are correctly applied.
- An individual from the Colville Tribe was concerned that noxious weeds were becoming ubiquitous on tribal lands. The member also commented that bio-control agents for noxious weeds are not very effective.
- An individual from the Warm Springs Tribe that worked in cultural resource section commented that Bonneville needs to consider the value of the Tribe's cultural sites when planning vegetation control activities. The commentor expressed appreciation for Bonneville's active role in practicing good stewardship of natural resources.
- An individual from the Yakama Nation had general question regarding the scheduling and implementation of operation and maintenance activities, including vegetation control and personnel performing vegetation control.
- One visitor had questions about the planning steps.
- Several commentors stated that trust needs to be built between Bonneville and the Tribes for planning and implementing programs. Firmly established mutual trust would provide long-term relations between the Tribes and Bonneville.



United States
Department of
Agriculture

Forest
Service

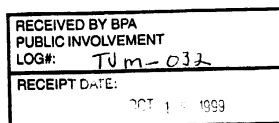
Modoc
National
Forest

800 West 12th Street
Alturas, CA 96101
530-233-5811

File Code: 1950

Date: October 9, 1999

Carol Borgstrom, Director
Bonneville Power Administration
Communications office
P.O. Box 12999
Portland OR 97212



Dear Ms. Borgstrom:

The Modoc National Forest would appreciate your consideration of the following comments in development of the Final Transmission System Vegetation Management Program Environmental Impact Statement.

- Formal tribal consultation on a government-to-government basis with potentially affected tribes is required for the federal lands under the administration of the Modoc National Forest. This consultation requires a one on one meeting between the tribes and a decision maker for the Bonneville Power Administration in addition to providing opportunities for written comments. The Modoc NF has provided the list of tribal representatives. Please let us know if this consultation has already taken place and the results.
- It is our understanding that the current authorizations and agreements between Bonneville Power Administration and the Modoc National Forest continue to be in effect. The process outlined in the DEIS is not consistent with these agreements. Until such time as Bonneville Power Administration completes the processes necessary to formally transfer land management responsibilities from the USDA Forest Service to the US Department of Energy for the right-of-way, the approving and deciding official for site-specific projects, which may effect the environment, remains the appropriate Forest Service line officer.
- BPA can greatly assist Forest Service decision makers by documenting environmental effects and considerations in a more complete statement than a checklist (Environmental documentation – page 81).
- Page 136 identifies the current BPA facilities covered by direction in the Northwest Forest Plan on the Modoc National Forest. This is not currently the case. All current facilities operated by BPA under agreements with the Modoc National Forest are outside the area of the Northwest Forest Plan.
- Please change the mitigation measure on page F-2 of Appendix F to read, "When seeding, use native species unless the use of non-native species is approved. The



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appropriate Forest Service Line Officer must approve all seeding mixtures in advance. Consider topping trees as an alternative to felling."

- Page 56, provides for the use of "public contact to help find out about any special uses of the land, or other issues or concerns that might need consideration when determining or scheduling vegetation control" on an only if needed basis. We suggest always use public contact and involvement within Modoc County. The Modoc County Board of Supervisors has established a land use committee to consider and comment on Federal Agency actions that may occur within the county.

Please contact Robert Haggard, Public Services Staff Officer, of my staff if you have any questions or comments concerning these issues.

Sincerely,

/s/ Robert T. Haggard

for
SCOTT D. CONROY
Forest Supervisor



United States
Department of
Agriculture

Forest
Service

Willamette National
Forest

211 East 7th Avenue
P. O. Box 10607
Eugene, OR 97440

File Code: 2600 Wildlife/Fish and
Sensitive Plant Habitat Management

Date: October 7, 1999

RECEIVED	BPA
PUBLIC COMMENT	
LOG#:	Tvm-a33
RECEIPT DATE:	OCT 11 1999

Stacy Mason, Project Manager
BPA
Communications Office-KC-7
PO Box 12999
Portland, Oregon 97208

Dear Ms. Mason,

Thank you for the chance to review the Transmission System Vegetation Management Program DEIS. Overall we feel the document does a good job of providing alternatives for management of vegetation as well as providing a process to accomplish site specific plans that will meet a variety of resource needs on the ground. We look forward to working with you on site specific management plan updates for each of the three corridors that are located on the Willamette National Forest as a follow up to this EIS. It appears that the planning steps outlined in the document will ensure that site specific concerns are addressed.

Our greatest concern with the powerline corridors at this time is centered on noxious weeds. A sizeable population of spotted knapweed has been located within the corridor near Blue River along the McKenzie River. This species is considered a new invader and as such has the highest priority for treatment on this forest. Each of the three corridors also have large amounts of scotch broom, blackberry and other noxious weeds. We would like to work with the BPA to develop an active management strategy to address this concern.

The following are comments specific to the DEIS.

Approach

We support the overall approach described in Alternative MA2 using Integrated Vegetation Management. We feel as if the overall management strategy, to focus on creating low-growing (preferably native) plant communities under powerline corridors, is a sound one.

Our Forest is in the process of completing a new Environmental Assessment for Integrated Weed Management. Mark Newbill, from your Eugene office, is on our mailing list. Many parts of the BPA preferred alternative will dovetail well with the Willamette EA.



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Methods

Alternatives R2 or R3 are both consistent with the methods outlined in our new EA. The Willamette EA addresses manual, mechanical, biological and herbicide control methods in powerline corridors. Treatment methods will be dominantly spot and localized, although some boom spraying from ATVs or trucks could be done.

Vegetation Selection

As stated above, the Forest is very supportive of vegetation treatments with herbicides for noxious weeds (VS1). If deciduous species need to be treated on Willamette NF land (VS2 or VS3), additional NEPA analysis will need to occur because the 1999 forestwide Integrated Weed Management EA covers herbicide use on only newly invading weed species.

General Comments

Page 35. It may be helpful to add a sentence to the 4th paragraph that explains perhaps only a subset of these herbicides may be available to use on certain lands. The Willamette EA only provides for the use of 2 of these herbicides, glyphosate and/or triclopyr.

Page 55. Mitigation measures for noxious weeds. Bullet #5: Washing vehicle clause. How about adding wording about developing sites to wash vehicles in association with land owners/managers as part of site-specific management plans.

Page 56. Mitigation measures for noxious weeds. Bullet #6: Reseeding should follow all ground-disturbing activities to help compete with weed seed in the soil. All seed should be state-certified weed-free. If one were to use a modifier on this sentence, it would be more appropriate to use "when appropriate" not "when practical".

Page 62 and Page 161. It's somewhat unclear exactly what these riparian zones apply to. It appears to be a mix of different standards, some are BPA some are BLM and others are NRCS. The Northwest Forest Plan buffers are only displayed in Appendix F. Perhaps it would be better to state that these are examples of potential riparian zones but that site specific locations and management plans will dictate the actual distances. Restrictions on buffer distances may also be applied as a result of consultation for listed fish species under the Endangered Species Act.

Corridor Specific Issues

Although some of these issues will be addressed only at the site specific scale we list them here for your consideration.

- The corridor near Blue River has a new invader noxious weed (as mentioned above) that needs immediate treatment. This corridor is also very densely stocked with scotch broom. We are very interested in updating the management plan soon. The Blue River District is currently looking at options to restrict access along the road beneath the powerline with a gate. BPA access would still be provided.
- The corridor near Lowell was mentioned extensively in the watershed analysis for Lookout Point. The BPA corridor is located in and around western pond turtle (a Forest Service Region 6 sensitive species requiring special management) habitat. Specifically, timing of vegetation

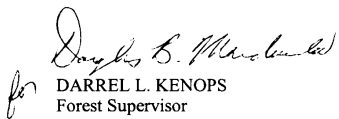
management needs to take into account the migration of pond turtle mothers through the corridor for nesting.

- Detroit Ranger District personnel will be writing a comprehensive management plan for the Pacific Gas and Electric (PGE) powerline corridor, which parallels the Detroit BPA corridor for approximately 18 miles, in the next year, as a part of the relicensing process for the PGE corridor. It would be beneficial for BPA to be involved with this site-specific management because working together could potentially lower costs for both PGE and BPA for management activities, surveys, etc. It would be beneficial for the Willamette NF to have a single set of guidelines for managing both corridors.

We look forward to the FEIS and to the update of site specific management plans for each of the three corridors that pass through the Willamette National Forest.

Thank you for the opportunity to review the DEIS.

Sincerely,


for
DARREL L. KENOPS
Forest Supervisor

cc: Russell Peterson, USFWS State Supervisor
William Stelle, Jr., Regional Administrator NMFS
Katherine Beale, Wildlife Biologist Army Corps of Engineers
Greg Concannon, Wildlife Biologist Pacific Gas & Electric



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

RECEIVED BY BPA
PUBLIC INVOLVEMENT
LOG#: TM-034
RECEIPT

OCT 8 1999

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Bonneville Power Administration
Communications Office
P.O. Box 12999
Portland, OR 97212

Dear Sir/Madam,

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA), the U.S. Environmental Protection Agency (EPA) is providing comments on the Department of Energy Bonneville Power Administration's Draft Environmental Impact Statement (DEIS) on the Transmission System Vegetative Management Program (DOE/EIS-0285).

Thank you for the opportunity to review this DEIS which establishes planning steps for managing vegetation for projects in the states of CA, ID, MT, OR, UT, WA and WY. Projects in these states will be tiered off of this EIS. Bonneville Power prepared this DEIS because of their responsibility to manage vegetation beneath power lines and at electric substations. The DEIS analyzes four vegetation control methods, 24 herbicide ingredients, and four herbicide application techniques. It examines alternative management approaches for rights-of-way, electric yards and non-electric facilities.

EPA has rated this DEIS EC-1. The rating of "EC" indicates that EPA has *environmental concerns* with the preferred alternatives. We suggest measures to reduce the environmental impacts of these alternatives. The rating of "1" indicates that the analytical information presented is adequate, although we suggest some clarifying language.

EPA agrees with Bonneville's preferred management approach (alternative MA2) that allows use of herbicides in combination with other methods to promote low-growing plant communities at rights-of-way. This approach should minimize impacts on non-target species.

EPA would prefer a management plan that avoids the use aerial or broadcast methods for applying herbicides. However, we understand that there are terrain or weed conditions where aerial or broadcast spraying of powerful herbicides according to the label is the only feasible approach. Accordingly, EPA agrees with alternative R4, but urges Bonneville Power to restrict the use of aerial and broadcast methods in upcoming projects as much as possible so as to avoid

2

deleterious effects on non-target plants and wildlife.

EPA can also support alternative VS3 which would allow herbicide use on any vegetation, but urges Bonneville Power to limit application whenever feasible to noxious weeds and deciduous plants and trees capable of re-sprouting.

Finally, EPA agrees with Bonneville's proposed approaches to managing vegetation at electric yards and non-electric facilities, although Bonneville should attempt to minimize the use of herbicides when implementing these approaches.

In addition to the mitigation measures Bonneville proposes to minimize adverse ecological impacts, EPA suggests that the Final EIS reflect the following:

- Vegetation management projects should select herbicides, application rates, and methodologies that are the least disruptive for adequately controlling the weed situation.
- When selecting a particular herbicide, consider using newer products, which often pose lower risks. Also, consider applying the herbicide at less than the maximum label rate where the lower level is efficacious.
- Projects should avoid to the extent feasible certain ingredients which are broad-spectrum and/or persistent and/or appear to affect non-target species. Of particular concern are bromacil, 2,4-D, dichlobenil, oryzalin, pendamethalin, triclopyr, and trifluralin. EPA is reassessing these ingredients for future use under the Food Quality Protection Act of 1996 which requires the Agency to consider all non-occupational avenues of exposure in its risk assessment.
- Bonneville should develop guidance for field staff responsible for implementing the program on use of low-impact approaches.

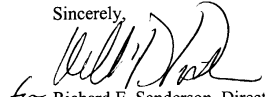
Finally, EPA suggests clarifying language on page 61 under the Section 404 discussion. The sentence in parentheses should be revised as follows:

(In certain circumstances vegetation debris left in a stream or wetland could be considered fill material for purposes of Section 404 of the Clean Water Act. Questions concerning the regulation of particular activities under Section 404 should be directed to the Regulatory Branch of the local U.S. Army Corps of Engineers District Office.)

3

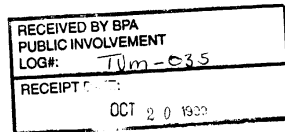
Again, we appreciate the opportunity to review this DEIS. Please contact Susan Absher at 202-564-7151 if you have any questions about these comments.

Sincerely,



for Richard E. Sanderson, Director
Office of Federal Activities

David Radtke
PO Box 244
Yachats OR 97498
541 547-3087



September 12, 1999

BPA
Communications Office KC-7
PO Box 12999
Portland OR 97208

Subject: Comments on Draft EIS for the BPA transmission system Vegetation Management System

In the Siuslaw Forest, Waldport Ranger District, a major north-south BPA transmission line cuts a swath about 300 yards wide through areas of timber that will never be cut again under the National Forest Plan. These areas used to be sprayed with herbicides, creating a grassy meadow area miles long.

As we understand the BPA-USFS agreement, these transmission right-of-way areas were supposed to be managed for "wildlife". Keeping the areas in a brush cycle now does not accomplish this earlier objective. We would like the BPA and USFS to honor their past agreement by keeping the areas in a grassy meadow condition. This would provide an alternative for wildlife such as deer and elk, etc. to the older forests surrounding these transmission lines. Could the BPA and USFS return to controlling brush (by mechanical or manual means) for grassy growth?

David Radtke
David Radtke

Hans Radtke
HANS RADTKE

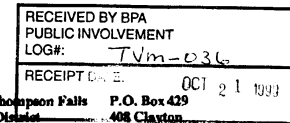


United States
Department of
Agriculture

Forest
Service

Plains/Thompson Falls
Ranger District
(406)826-3821

P.O. Box 429
408 Clayton
Plains, MT 59859



File Code: 2730
Route To: Lolo Lands

Date: October 4, 1999

Subject: Comments to BPA's Draft EIS for Transmission System Vegetation Management

To: Lisa Subcaskey

Here are my comments on BPA's DEIS, they are broken out into the following categories: Riparian Protection, Use of Herbicides, Project Proposal Notification, NEPA Responsibility, Other Alternatives and USFS to FS.

Riparian Protection

- 1) Table III-1 Riparian Buffer Zones (page 62) needs to be thoroughly reviewed by fisheries biologist to ensure INFISH standards are being met with the proposed buffer zones.
 - 2) Table III-2 Herbicide Free Zones (page 62) should be expanded to describe how close to natural streams the various proposed herbicides can be used.
 - 3) The study cited on page 167 has been taken completely out of geographical context. The climate, soils, vegetation are all completely different between New York and the Pacific Northwest. Surely there is a study applicable to the Pacific and Inland Northwest that discusses the impacts of removing overstory along stream reaches.
 - 4) Page 169, Mitigation Measures, states "Apply all appropriate mitigation measures for water bodies". These "appropriate mitigation measures" should be referenced or stated as there is no way of knowing what these measures are.
- #### Use of Herbicides
- 1) Lolo National Forest Noxious Weed FEIS and Lolo Forest Plan Amendment 11 contains many mitigation measures for use of herbicides on Lolo National Forest, these requirements will need to be incorporated into any spray project proposals which will occur on the Lolo. I would suggest a copy of Amendment 11 be forwarded to BPA for inclusion into their planning documents if this has not already been done. Also DEIS Appendix F does not contain all of the mitigation measures found in Amendment 11.
 - 2) The BPA DEIS seems have a fairly subjective tone making assertions that herbicides are not harmful, yet the DEIS does not cite references to fully support this position. For example, on page 168, the DEIS states "There is little potential for fish to be exposed to herbicides: mitigation measures.....only a relatively small amount of area would be treated within a landscape." The DEIS does not state the effectiveness of the mitigation measures nor does it cite research work that confirms this assertion.

The DEIS also makes some contradictory statements. For example, on page 168, the DEIS states that "many of the herbicides proposed by Bonneville are low in toxicity to fish" yet in Table VI-6 (page 175) 11 of the 24 herbicides are listed as moderately to highly toxic to aquatic resources, in addition, 2 of the herbicides listed in this table do not have any aquatic toxicity data. 11 of 24 possibly



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Page 3/5

Oct-19-99 15:34

202 2051604

Sent By: USDA FOREST SERVICE

13 of 24 herbicides being moderately to highly toxic does not match the assertion on page 168 that many of the herbicides are low in toxicity.

NEPA Responsibility

On Page 185, BPA makes the statement that "the decisions on vegetation management of rights-of-way across USFS and BLM managed lands are Bonneville's and therefore Bonneville is responsible for complying with NEPA." And goes on to state "The USFS and BLM usually would not have a decision to make (that would trigger their NEPA process) unless the proposed vegetation management were not consistent with their existing plans and regulations."

The Memorandum of Understanding between BPA and USFS dated 1974 (FSM 1531.73a) provides for BPA's occupancy and use of National Forest lands consistent with laws applicable to the management of National Forest System in Item 1. Also, Item 6 provides for a subsidiary MOU to implement the master agreement. In the Subsidiary Memorandum of Understanding dated 1974 (FSM 1531.72a, FSM 8/83 R-1 Supp 41) Section 1B. *Environmental Analyses and Environmental Impact Statements* states that "Bonneville and the Forest Service will conduct environmental analyses and prepare environmental impact statements in accordance with their individual procedures". It also states that "When an environmental statement is to be prepared, the agency initiating the proposal will take the lead in statement preparation. The other agency will actively participate in development of the statement by (1) providing.....existing information..... and (2) review and comment on the draft and final environmental statement."

Thus the wording in the DEIS is not entirely correct and could mislead agency as well as public individuals as to whose responsibility the decision making really is. As I see it the FS has only granted BPA the occupancy and use of National Forest lands not the ownership nor management responsibility of these lands, in addition the FS and BPA have agreed that environmental assessments will be conducted in accordance with their individual procedures. The fact that (1) National Forest land management under BPA facilities is a responsibility that remains with the Forest Service and (2) the FS must comply with FS NEPA procedures, places the decision making responsibility squarely with the Forest Service for activities on National Forest lands.

This section should be rewritten in order to clarify BPA's role as they cross National Forest lands. The existing MOUs provide a lot of direction regarding roles of the various agencies.

Project Proposal Notification

Another bullet on page 58 under USFS managed lands needs to be added which includes BPA Project Managers notifying the FS in advance of any proposed projects (non-emergency) involving NF lands. This is needed in order that FS NEPA procedures are complied with. This requirement is already contained in the Right of Way Management Plan for BPA facilities on the Plains/Thompson Falls Ranger District but I'm not sure of other Districts and Forests thus would be helpful to reiterate the message again in the FEIS.

Other Alternatives

The DEIS only addresses alternatives that manage vegetation in order to maintain safe operating clearances. The EIS does not address any alternative which manages the transmission facilities in order to maintain safe operating clearances. I'm not an expert of transmission facility engineering but would think that in some specific instances in which raising tower structures, adding new towers, minor route realignments, possible even managing current loads during periods of high temps to

prevent unsafe line sags could be implemented as a way to allow vegetation to develop naturally and provide critical resource benefits while continuing to transmit electricity safely. This EIS process could address the specific planning steps which would identify specific conditions/locations where managing the transmission facilities rather than the vegetation would be appropriate. Further site specific analysis would be needed to determine exact locations of new towers, right-of-way clearings, etc.

USFS to FS

A small item but isn't the USFS abbreviation incorrect and really should be either USDA-FS or just FS.

Sincerely,

Fred Haas
Resource Forester
Plains/Thompson Falls Ranger District



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse

STREET ADDRESS: 1400 TENTH STREET, ROOM 222, SACRAMENTO, CALIFORNIA 95814
MAILING ADDRESS: P.O. BOX 3044, SACRAMENTO, CA 95812-3044
916-445-0613 FAX 916-323-3018 www.opr.ca.gov/clearinghouse.html



Loretta Lynch
DIRECTOR

October 4, 1999

Stacy Mason
Bonneville Power Administration
905 NE 11th Avenue
KECP-4
Portland, OR 97232

Subject: Transmission System Vegetation Management Draft EIS
SCH#: 99084004

Dear Stacy Mason:

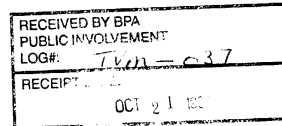
The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period closed on October 1, 1999, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the eight-digit State Clearinghouse number when contacting this office.

Sincerely,

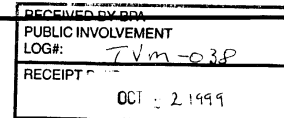
Terry Roberts

Terry Roberts
Senior Planner, State Clearinghouse



Kuehn, Virginia (Ginny) -KCC-7

From: Mason, Stacy L. - KECP
Sent: Friday, October 22, 1999 11:44 AM
To: Kuehn, Virginia (Ginny) -KCC-7
Subject: FW: BPA right of way EIS



Ginny -
Another comment for the Transmission System Vegetation Management Program EIS comment log.
stacy

-----Original Message-----

From: Hiebert_Paul_A/r1_ipnf@sv2wo [mailto:Hiebert_Paul_A/r1_ipnf@sv2wo]

Sent: None
To: ballen/r1@sv2wo; Anderson_Scot_L/r1_ipnf@sv2wo;
Mousseaux_Mark_R/r1_ipnf@sv2wo; Bain_George_M/r1_ipnf@sv2wo
Subject: BPA right of way EIS

bruce. i supervise the noxious weeds program on the south zone (st.joe) of the ipnf. mark mousseaux told me that you are the one gathering input for the BPA EIS. it seems to me that there should be some shared responsibility for noxious weeds control in not only the right of way but also the roads that access the towers. portions of roads within the forest service road system, i am sure, are maintained and left open and maintained solely because of the need for access to the towers. it seems to me that there should be a shared responsibility for weed control on these roads. just some thoughts for your input to the EIS.



United States
Department of
Agriculture

Forest
Service

Washington
Office

14th & Independence SW
P. O. Box 96090
Washington, DC 20090-6090

File Code: 2720

Date:	OCT 22 1999
RECEIVED BY BPA	
PUBLIC INVOLVEMENT	
LOG#:	TVM-039
RECEIPT DATE:	NOV 10 1999

Bonneville Power Administration
Communications Office - KC - 7
P.O. Box 12999
Portland, Oregon 97208

RE: USDA-Forest Service Comments to DOE/EIS-0285; Draft Environmental Impact Statement (DEIS), Transmission System Vegetative Management Program

With this correspondence, the Forest Service is submitting additional, programmatic comments in response to our review of the above referenced document, dated August, 1999. Additional comments have previously been provided submitted by the Forest Supervisors of the Flathead and Kootenai National Forests in Montana, in a letter from the Forest Supervisors of those Forests, dated October 5, 1999. The following are intended to be supplementary to those "Forest - specific" concerns.

CHAPTER I - PURPOSE AND NEED

Page 3: Reasons for the EIS: Your document states that:

"Preparation of this document is intended to fulfill the requirements of the National Environmental Policy Act (NEPA) for Bonneville"

What does this mean? What specific NEPA requirements is this EIS intending to fulfill (if any)? The Forest Service does not believe that this programmatic analysis is adequate to account for the environmental effects of site specific vegetative management activities along every mile of Bonneville's transmission facilities on National Forest System lands. Statements like that quoted above have the potential of implying otherwise. This statement should be clarified to more appropriately state something to the effect that:

"This document discloses the estimated environmental effects of a variety of vegetative management methods that may be considered and applied at Bonneville facilities. Decisions for treatment methods will be made in accordance with existing and/or future site-specific vegetative management plans".

Page 4: Efficiency and Consistency; Your document states:

"Site-specific analysis would be in the form of a Supplemental Analysis"

Recommend you add to this statement the following:

"Supplemental, site-specific analyses will be documented, and appropriate decision documents written, in accordance with the policies and procedures for the implementation of NEPA of the



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BPA's Programmatic Vegetative Management Plan (DEIS)

2

agency having land management jurisdiction on the affected area, and in accordance with all other applicable State and federal laws and regulations".

Pages 18-19: Forest Service and Bureau of Land Management Documents/Projects:

Please add to the listing of documents provided the following:

Forest Land and Resource Management Plans - The plans provide for the allocation of National Forest System (NFS) lands and resources for a variety of management purposes. They include management direction, objectives, prescriptions, standards and guidelines, etc. applicable to each National Forest, and to designated management areas within each Forest. Pursuant to the National Forest Management Act of 1976, all site specific (or "project level") management activities must be consistent with the direction in each applicable land and resource management plan.

Other Forest Service Land or Resource Management Plans - Management direction, prescriptions, and guidelines in other management plans, such as Wild and Scenic River Management Plans, may also have applicability in the consideration of vegetative treatment methods used in developing site specific vegetation management plans.

Although this document lists Forest Land and Resource Management Plans as Guidance Documents in Appendix F, we believe that such Plans are of such importance in guiding management activities on NFS lands, that they should also be listed in this part of the document.

CHAPTER III - SITE-SPECIFIC PLANNING STEPS

Page 58: USFS-Managed Lands: Recommend revising the fifth bullet statement under this heading to read as follows:

"If expecting the USFS to require environmental data collection for evaluation, allow more than one year for completion, and be prepared to reimburse the USFS for its cost to collect and analyze data, conduct the environmental analysis, document that analysis, and/or the cost to contract for such activities".

Page 58: USFS-Managed Lands: Recommend revising the seventh bullet statement under this heading to

read as follows:

"Comment and engage in all Forest Service proposals to revise or amend Forest Land and Resource Management Plans, to assure that the designation and management of utility corridors are adequately addressed wherever appropriate."

Page 58: Recommend that BPA also consider including, either in the selected alternative itself, or in the Record of Decision, specific direction that will require BPA's Project Managers to review all

EXISTING site-specific vegetative management plans, for consistency with the selected alternative of this programmatic analysis, and to revise or amend those existing plans as necessary to make them consistent with the findings, standards, guides, management direction, etc. in the selected alternative/Record of Decision of this EIS.

COMMENTS TO APPENDIX "F": USFS MITIGATION MEASURES AND BACKGROUND

Page F-1: The reference on that page to BLM (middle of page) is inaccurate. The sentence should be revised to read:

"These mitigation measures were developed based on current USFS Land and Resource Management planning documents."

Page F-1; Fourth Paragraph under "Mitigation Measures Specific to the USFS": Revise the paragraph to read:

"These mitigation measures will be used in reviewing, updating (as necessary) and developing site-specific vegetative management plans for BPA's facilities located on National Forest System lands. Additional measures may be used to adequately mitigate site specific environmental effects or concerns".

Page F-2; Second Bullet: Revise to read:

"Proposals for herbicide use will be subject to the review, and either concurrence or approval, by an authorized Forest Officer".

Page F-6, F-7: Recommend that the definitions of "Standards and Guidelines" be moved from Page F-7 and more appropriately be placed in front of all of the planning documents listed on these two pages, just in prior to the list beginning with "Forest Plans". Standards and guidelines are common terms used in nearly all land and resource management planning documents. Placing the definitions of these terms as written makes it appear that they (the definitions) are applicable only to their use in the Interior Columbia River Basin Draft EIS's/Appendices.

Page F-15; Third Bullet:

We can't emphasize enough the importance of this bullet statement with respect to vegetative management activities on National Forest System lands. The statement: "Site specific analysis is needed for all projects" appears here under the **"Wildlife and Fish"** section of these Mitigation Measures. However, this is a statement that should more appropriately be stated elsewhere in Appendix F, to make it direction applicable to ALL of the BPA's vegetative management activities on NFS lands. We recommend that at the very beginning of Appendix F, language be included which states the following:

"Site-specific vegetative management plans, developed in accordance with the standards and guides of this programmatic EIS, should be developed by Program Managers in advance of

implementing vegetative management activities on NFS lands. Existing vegetative management plans should be reviewed and revised, if necessary, to make them consistent with the Record of Decision and selected alternative of this EIS".

GENERAL COMMENTS - - -RECOMMENDATIONS/CONSIDERATIONS FOR REALIZING THE FULL POTENTIAL BENEFIT OF THIS PROGRAMMATIC PLANNING EFFORT

The Forest Service sincerely appreciates the BPA's efforts to reach out, solicit the concerns of the Forest Service, and to address those concerns in this programmatic analysis. We believe that most of the Forest Service's concerns, previously provided to the BPA in the course of this analysis, have been adequately disclosed and addressed in this DEIS. Our agency's concerns can be more fully addressed with revisions to the document, as identified in this correspondence (above) and in additional comments that have been submitted by individual National Forests.

In more general terms, however, and as reflected in these most recent comments, the Forest Service has consistently represented to the BPA that a product of this programmatic analysis, and its Final EIS/Record of Decision, will NOT be Forest Service approval for the BPA to begin the implementation of vegetative treatment methods along its rights-of-way on National Forest System lands. We believe that existing, revised, and/or new site-specific vegetative management plans are needed as the basis for vegetative treatment activities on any segment of BPA's authorized use and occupancy on NFS land. Such plans need to be developed and adopted for use in accordance with the provisions of NEPA, and pursuant to the provisions of the outcome of this EIS/ROD.

As you have disclosed in this document, the programmatic approach that you are undertaking will serve to identify the environmental effects of various treatment methods. Its primary benefit will be its availability as a source of reference in the development of site specific management plans. In tying to the environmental effects of various treatment methods, as disclosed and documented in this analysis, the need to repeatedly (and potentially, inconsistently) cite those effects in individual site-specific plans will be precluded.

However, with your adoption of this programmatic plan, there will be a potential opportunity created to more fully realize its benefits with respect to vegetative management activities on NFS lands. That can happen if the BPA is willing to consider a comprehensive revision to the manner in which its facilities on NFS lands are now authorized. Currently, BPA's generation and transmission facilities are authorized on NFS lands under a wide variety of old, and in some cases, obsolete, forms of authorizations. They include unique Land Use Grant Instruments ("LUGI's") (that were created specifically for the BPA), Memorandums of Understanding, and various forms of our more standardized special use permits. There is little to no consistency in the terms and conditions between these different types of authorizations. Some include requirements which suggest that the Forest Service is responsible for the development of vegetative management plans (for review and approval by the BPA); a concept that is totally contrary to our management of special uses. Others have little to no reference to vegetative management activities whatsoever. In such cases, BPA has suggested that vegetative management is part of the all-inclusive concept of authorized "maintenance" of the facilities, as provided in the authorization.

BPA's Programmatic Vegetative Management Plan (DEIS)

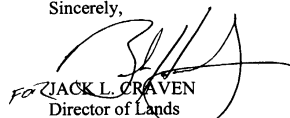
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We recommend that upon the adoption of this programmatic plan, the BPA enter into discussions with the Forest Service to consider the potential of replacing all of these existing Forest Service authorizations with current special use authorizations for its facilities on NFS lands. Those discussions should address the feasibility of replacing all of BPA's existing authorizations with long-term, transferrable easements that:

- a) Are minimal in number (perhaps no more than one easement per National Forest on which BPA's facilities are located, or maybe no more than one easement per Forest Service administrative Region;
- b) Have standard terms and conditions, including standardized provisions for operation and maintenance of authorized facilities;
- c) Include a standardized format for operation and maintenance plans; AND
- d) Tier to the BPA's Record of Decision/Final EIS for its Programmatic Vegetative Management Plan, provide for an Authorized Forest Officer's to simply "concur" with site-specific vegetative management plans (rather than "approve" them), when such plans are developed consistent with and tiered to the provisions of the programmatic plan.
- e) Will provide the BPA with a long term assurance of tenure, and a transferrable interest in the NFS lands being used and occupied.

We believe that this approach has the potential to benefit both of our agencies, and provides the opportunity for your agency to realize a significant increase in the value of the programmatic vegetative management plan you are now working towards adopting. I encourage you to pursue the feasibility of this approach with Randy Karstaedt, our Special Uses Program Leader here in this office, at 202-205-1256.

Sincerely,

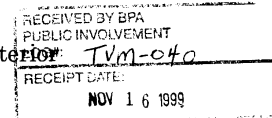

 JACK L. CRAVEN
 Director of Lands



IN REPLY REFER TO:

United States Department of the Interior

OFFICE OF THE SECRETARY
 Office of Environmental Policy and Compliance
 500 NE Multnomah Street, Suite 356
 Portland, Oregon 97232-2036



November 10, 1999

ER 99/0750

Bonneville Power Administration
 Communications Office
 P.O. Box 12999
 Portland, Oregon 97212

The Department of the Interior (Department), has reviewed the Draft Environmental Impact Statement (DEIS) for the Transmission System Vegetation Management Program, Idaho, California, Montana, Utah, Wyoming, Oregon and Washington. The following comments are provided for your use and information when preparing the Final Environmental Impact Statement (FEIS).

GENERAL COMMENTS

In general, the Department supports the integrated approach which uses manual, mechanical, biological, and chemical methods to control vegetation on Bonneville Power Administration's (BPA) electric facilities, namely rights-of-way, electric yards, and non-electric facilities. In addition to previously utilized chemical control agents for the program, the current document now proposes the use of a total of 24 herbicidal compounds singly and in combination. While we applaud the document for not suggesting solely the use of toxic herbicides, the Department has concerns over the effects that several of the herbicides may have on non-target species, particularly endangered, threatened, and proposed species. The Fish and Wildlife Service (Service) has provided a list of such species for western Washington appears at the end of this comments section. Other Service offices can provide endangered species lists for their geographic areas. Prior to the site specific use of chemical control methods via spot, localized, broadcast and especially aerial applications, we urge BPA to work closely with the Service's field offices to minimize effects to non-target species.

The document refers to herbicides simply in terms of 'active ingredient'. Several of the compounds listed in the program have different formulations such as glyphosate and triclopyr. The different formulations contain different amounts of active ingredient, different inert compounds, and different adjuvants all of which determine the fate and effects in the environment, thus making it difficult to assess the potential toxicity to our trust resources.

Also, several of the herbicides selected for the program are very persistent in soil. An example of this is isoxaben, which has a soil half life of 5 to 6 months. Since the document states that herbicide application in electric fields may occur as often as once a year, the Department would

advise BPA to assess if chemical control is needed every year, and if so, to select compounds that are less persistent reducing the potential for accumulation and residual levels of these chemicals in the soil.

We also suggest the use of secondary containment of chemicals during transportation and storage to reduce the risk of a spill. Due to the potential for additive and synergistic interactions between chemical compounds, the use of two chemicals as a mixture should be used sparingly and with great caution in order to minimize environmental repercussions. It is imperative when formulating your tiered project specific planning steps to take into consideration the comments listed above.

Please be advised that several of the land owners involved in the program, including the U.S. Forest Service (USFS), restrict the types of chemical agents that are allowed to be used on their lands. Typically only five herbicides are approved for use on Washington State USFS land. These compounds are 2,4-D, dicamba, glyphosate, picloram, and triclopyr. Coordination between land owners and BPA should take place during the planning steps and prior to herbicide application to ensure the interests of all parties are addressed.

The program allows for the approval of new techniques and new herbicides that are not presently listed by name in the document. We have reservations about the approval process, which allows BPA to determine the environmental impacts of newly registered compounds using EPA risk assessment data without contacting the Service. Threatened and endangered species may have different considerations than risk assessment models assume and may be more sensitive to particular compounds than the organisms tested during the registration process. Thus, we urge BPA to contact and involve the Service if they contemplate adding any new herbicide to the program. Finally, in our opinion the use of a newly registered herbicide would require BPA to consult with the Service regarding effects to threatened and endangered species.

The Department does not object, in a programmatic sense, to BPA's preferred alternatives. However, the DEIS does not provide sufficient implementation detail, mitigation commitments, or alternative analysis to determine site specific impacts. Specifically, we would like to have the same mitigation measures listed for electric fields also apply to rights-of-way, non-electric fields, and noxious weed control. We recommend that site specific plans be completed for this work or that the information lacking be included in some other format. We would like to be involved in the future review of this program if BPA decides to significantly change the described preferred alternatives or follows through on our recommendation to produce site specific plans for the program in our region. We applaud BPA's effort to integrate environmentally preferred alternatives into the program and encourage the implementation of any habitat enhancing measures for fish and wildlife that can be undertaken as part of the program (i.e., allow for the growth and establishment of low growing vegetation, leave debris and brush piles in place to provide habitat, and top trees while leaving the stumps in place).

SPECIFIC COMMENTS

Herbicide mitigation measures

Under Planning Step 1 (Identify Facility and the Vegetation Management Needs), herbicide mitigation measures are specified only for electric yards. We recommend that the same mitigation measures also be specified in this planning step for rights-of-way, non-electric facilities, and noxious weed control throughout the BPA service territory. Specifically, these mitigation measures include rotating herbicide use to prevent resistance, avoiding spray drift, determining if water bodies require monitoring for herbicide contamination, and observing riparian buffer and herbicide-free zones defined on page 62 of the DEIS.

Herbicides and herbicide formulations

In Planning Step 2 (Identify Surrounding land Use and Landowners/Managers), project managers are instructed to review site-specific vegetation management plans for consistency with both U.S. Forest Service (USFS) and U.S. Bureau of Land Management (BLM) mitigation measures, which are specified in Appendices F (USFS) and G (BLM) of the DEIS. Appendix F lists eight herbicide active ingredients that are approved for use by both USFS and BPA.

Experience with USFS vegetation control in Oregon and discussions with USFS personnel indicate that only four herbicide active ingredients (glyphosate, picloram, dicamba, and 2,4-D) may be used in Oregon for any type of vegetation control on USFS lands. These herbicide restrictions result from the Mediated Agreement between the Northwest Coalition for Alternatives to Pesticides, the Secretary of Agriculture, and Oregonians for Food and Shelter (May 24, 1983). Similarly, Appendix G lists 20 active ingredients or combinations that are approved for use in vegetation control by both BLM and BPA.

A footnote to this list indicates that throughout all of Oregon, herbicides may only be used for noxious weed control. Experience with BLM vegetation control in Oregon and discussions with BLM personnel confirms that throughout all of Oregon herbicides may only be used for noxious weed control. Only four active ingredients (glyphosate, picloram, dicamba, and 2,4-D) or combinations (2,4-D plus glyphosate, picloram, or dicamba) may be used in Oregon on BLM lands. While these latter restrictions are stated on page G-2 of the DEIS, other comments by BPA about eastern Oregon restrictions are misleading. We recommend that project leaders carefully review these herbicide restrictions with USFS and BLM personnel as part of Planning Step 2, and that the Final Environmental Impact Statement reflect USFS and BLM policies more accurately.

Under Planning Step 3 (Identify Natural Resources), general riparian buffer and herbicide-free zones are presented as mitigation measures to reduce potential contamination of water resources. As discussed in Chapter VI of the DEIS, the physical properties of herbicides partly determine environmental fate. In addition, different formulated products of the same active ingredient often have different environmental fates and effects (e.g., Roundup and Rodeo formulations of glyphosate, Garlon 3A and 4 formulations of triclopyr). The DEIS does not specify which formulated herbicide products will be used in vegetation management, so the Service cannot comment on potential adverse effects. However, since there are differences in environmental fate among herbicides, the use of generic riparian buffer and herbicide-free zones for all herbicide applications is not justified.

We recommend that site-specific planning include a detailed examination of the environmental fate and effects of proposed formulated herbicide products such that more restrictive riparian buffer and herbicide-free zones may be used when necessary to protect natural resources, particularly endangered and threatened species, other wildlife, fish and aquatic organisms, and water.

As part of Planning Step 4 (Determine Vegetation Control Methods), specific weather restrictions are presented as one mitigation measure to reduce herbicide drift and leaching. However, as described in Chapter IV, geology and soil types also are important in determining if herbicides will migrate to water resources. We recommend that climate, geology, and soil types be included in Planning Step 4 as factors to consider in selecting vegetation control methods.

Chapter IV also discusses toxicity as one factor that determines if an herbicide will cause adverse effects to fish or other aquatic resources. In addition, differential toxicity among herbicides is described and BPA states that using less toxic herbicides "in the vicinity of fish-bearing lakes or ponds would reduce the potential for adverse effects." The Service agrees with this assessment, however we recommend that evaluation of the toxicity of formulated herbicide products (not active ingredients) be included in site-specific planning, perhaps under Planning Step 4.

Endangered Species

Because of time constraints in reviewing the DEIS, we are unable to comment specifically on potential impacts to endangered and threatened species. The Service agrees that the procedures outlined under Planning Step 3 will permit project managers to comply with the provisions of the Endangered Species Act, as amended. However, we recommend that BPA consider, for the sake of efficiency, a programmatic consultation at the appropriate level (e.g., state, watershed, or species). We also recommend that any such programmatic consultation address potential project impacts to all species proposed for listing, regardless of whether BPA reaches the statutory conference threshold of being likely to jeopardize such proposed species. Chapter II of the DEIS describes the process whereby BPA may approve of new techniques if they are judged more effective or more "environmentally benign." The Service points out that new techniques may result in new effects to listed species not previously considered in consultation and therefore may trigger reinitiation of consultation.

Canada Lynx - Due to the recent proposal to list the Canada lynx (*Lynx canadensis*) as threatened and potential impacts to lynx from the proposed vegetation management program, it is appropriate to provide comments specific to this species. In addition to being proposed for listing, the Canada lynx is a USFS sensitive species, a Northwest Forest Plan "survey and manage" species (in Oregon and Washington), and is listed as a threatened species by the State of Washington. The proposed BPA vegetation management activities would potentially impact Canada lynx throughout their range.

The abundance of snowshoe hares significantly influences lynx populations (Parker et al. 1983, Brittell et al. 1989, Koehler and Brittell 1990, Koehler and Aubry 1994). Prime snowshoe hare habitat includes dense coniferous and deciduous thickets approaching 14,000 stems or boughs per acre. These conditions are often found beneath BPA transmission lines at higher elevations. To

be available for snowshoe hare during the winter months, forage cover must be 6 to 8 feet tall where average snow depth does not exceed 3 to 4 feet (Brocke 1975, Wolff 1980, Litvaitis et al. 1985, Monthey 1986, Brittell et al. 1989, Koehler 1990). Some hardwoods, particularly willow, are also used by snowshoe hares during the winter months (Conroy et al. 1979, Brittell et al. 1989, Koehler 1990, Koehler and Brittell 1990).

Providing adequate winter forage for snowshoe hares is a key component of maintaining or expanding snowshoe hare and Canada lynx populations. The habitat beneath transmission lines provides lynx forage cover if it consists of at least 4,700 stems or boughs per acre (1,210 trees per acre, 8 feet tall, with 6-foot spacing). This height and spacing provides adequate snowshoe hare forage and cover during average winter snow depths. The BPA management approach of promoting "low-growing plant communities" in rights-of-way using herbicides or other vegetation control methods is incompatible with management for hare and lynx. Impacts to lynx would be minimized by maintaining dense thickets of coniferous/deciduous vegetation of adequate height.

Listed species: Washington Cascades Only

The western portion of the Cascade Mountains in the State of Washington are associated with federally listed and proposed threatened and endangered species under the Endangered Species Act (ESA). Of the species that may be impacted by the program, the bald eagle, the spotted owl, the marbled murrelet, and bull trout are of particular concern.

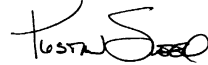
Not only are direct, indirect, and cumulative effects of concern, but secondary poisoning is also an issue that will need to be addressed when considering the use of chemical control methods around habitats that contain higher trophic level organisms. Temporal issues are also of concern. The time of year chemical control agents are used is critical and should not coincide with such activities as bald eagle and marbled murrelet nesting as well as bull trout spawning and incubation.

Also, any application around water bodies should be done with the utmost care, especially when using products such as benefin, pendimethalin and trifluralin which are highly toxic to numerous aquatic species. We would advise the maximization of buffer and herbicide-free zones when applying all compounds but especially when highly toxic compounds would be applied around water. Also, low level aerial applications of herbicides may cause disturbances to threatened and endangered species.

Due to the aforementioned concerns, information provided in the proposed integrated approach, especially the chemical control methods, may have adverse impacts and may have effects on listed species. Finally, the document states that formal consultation is not needed for species previously consulted on, such as the marbled murrelet. It is our opinion that this program constitutes a new action and as such, if effects are likely to be expected from this new action, consultation on all currently listed species must be conducted.

We hope these comments are both constructive and helpful in completing the final Transmission System Vegetation Management Program - Environmental Impact Statement. We appreciate the opportunity to review and provide comments on this matter.

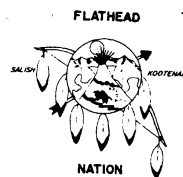
Sincerely,



Preston A. Sleeper
Regional Environmental Officer

Literature Cited for Canada Lynx

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Joseph E. Dupuis - Executive Secretary
Vern L. Clairmont - Executive Treasurer
Frederick Cordier - Sergeant-at-Arms

THE CONFEDERATED SALISH AND KOOTENAI TRIBES OF THE FLATHEAD NATION

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Tribal Preservation Office

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Lloyd D. Irvine

December 8, 1999

Alexandra Smith
Vice-President of Environment, Fish and Wildlife
Bonneville Power Administration
P.O. Box 3621
Portland OR. 97208

Dear Ms. Smith:

Thank you for the chance to comment on the Bonneville Power Administration's Transmission System Vegetative Management Program DEIS. Our meeting with Stacy Mason of the BPA was very informative and we consider this meeting the beginning of a cooperative effort to protect cultural resources on BPA managed transmission right-of-ways. Though it is late in the comment period there are some major concerns that our Tribes feel the need to address.

First, we wish to address the apparent lack of an intensive cultural resource survey within the BPA transmission line corridors and at electrical facilities on and adjacent to the Flathead Indian Reservation. We are unable to locate any record concerning prior cultural resource survey or National Historic Preservation Act consultation with the CSKT on BPA transmission lines on or off the reservation in northwestern Montana. Lacking specific cultural resource data, it is simply impossible to assess proposed vegetation control impacts on cultural resources, or ongoing impacts to cultural sites from other transmission line management activities.

Secondly, for the CSKT, cultural resources include traditionally used cultural plant communities and plant harvest and processing areas as well as archaeological properties. Tribal elders have expressed their concerns in the past that chemical agents may pollute the native cultural plants they use for food, medicine and ceremony. Therefore, we believe that certain manual, biological and chemical vegetation control measures can adversely impact traditional cultural use properties and archaeological sites, and that these impacts should be taken into account under Section 106 of the National Historic Preservation Act (NHPA).

The Confederated Salish and Kootenai Tribal Preservation Office (CSKTPO) is responsible for protection of historic and prehistoric cultural resources on the Flathead Indian Reservation and also has an obligation to

protect cultural resources off the reservation within our ceded or aboriginal territories. These rights and responsibilities are clearly delineated within the 1999 revised regulation for implementing Section 106 of the NHPA. Therefore we provide the following recommendations:

- Implement a cultural resources inventory including a traditional cultural plant survey within the transmission line corridors and electrical facility sites on and adjacent to the Flathead Indian Reservation to identify cultural plant communities and other cultural resources.
- Develop a right-of-way management plan in consultation with the CSKT for power system corridors on and adjacent to the Flathead Indian Reservation.
- Employ tribal members to perform management tasks on and adjacent to the reservation.
- Use CSKT tribal vegetative guidelines on and adjacent to the Flathead Indian Reservation.
- Define a consultation protocol with the CSKTPO for potential impacts to cultural resources on and off reservation.

We look forward to an opportunity to meet with you or your staff soon to discuss these recommendations. We believe that it is critical to continue consultation with Joanne Bigcrane, CSK Tribal Ethnobotanist concerning native plant revegetation and the posting of chemically treated plants in plant harvesting areas. Our staff is also prepared to undertake the cultural resource studies recommended above in conjunction with the Salish and Kootenai Culture Committees and the Elders Advisory boards. Please contact Tim Ryan of our staff with your ideas for a time and place to meet. You can reach him at (406) 675-2700 ext.1081

Sincerely,

Marcia Cross
Marcia Cross
Tribal Preservation Officer

CC: Stacy Mason

† In honor of the years of dedicated service to the Tribes by the late Michael T. Pablo, the position of Chairman will remain vacant until January 2000, with the Vice Chairman assuming the duties as provided by the CSKT constitution.



The Klamath Tribes

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Chiloquin, Oregon 97624
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800-524-9787

January 4, 2000

Stacy Mason
Communications Office - KC-7
P.O. Box 12999
Portland, OR 97208

RE: BPA Transmission System Vegetation Management Plan DEIS

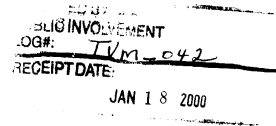
Dear Stacy:

This letter is to reiterate and clarify previously communicated concerns and recommendations of the Klamath Tribes on the Draft EIS for the BPA Transmission System Vegetation Management Plan. The Klamath Tribes' Natural Resource Department has reviewed the DEIS. The DEIS was also discussed with the Klamath Tribes' Culture and Heritage Department Director. Following are comments and recommendations.

It is important to ensure that proper consultation occurs with potentially affected tribes during NEPA planning of site-specific vegetation management projects. Though chapter three ("Site Specific Planning Steps") includes text pertaining to tribal consultation, it is recommended that this section be revised to more clearly describe the need for tribal consultation.

Maps of the general area of concern to the Klamath Tribes are enclosed for reference and, and if appropriate, inclusion into the Final EIS. Additional pertinent information on the history of the Klamath Tribes is also included.

The enclosed maps depict the area recognized by the U.S. Government as the homeland of the Klamath, Modoc, and Yahooskin Band of Snake Indians during negotiation of the Treaty of 1864 (CEDED LANDS). (Note: Until recently, because of language within the treaty, the three tribes were referred to collectively as the Klamath Tribe. In recognition of the fact that tribal membership consists of members from three distinct



tribes, the name was changed to the Klamath Tribes through a recent tribal governmental action.) In terms of cultural resource protection and management, the homeland of the three tribes is often referred to as "The Klamath Tribes' Area of Cultural Influence." Physical and historical evidence indicates that the Klamath Tribes used this area historically. Because artifacts attributable to the Klamath Tribes have also been discovered outside the area depicted on the maps, it is recognized that the maps describe only the Tribes, general area of concern. In addition, it is important to note that this area was not used exclusively by the Klamath, Modoc, and Yahooskin Band of Snake Indians, and that historical use by other tribes and bands overlap in some areas.

Though the Klamath Tribes were "terminated" from federal recognition as an Indian tribe in 1954 (see enclosed literature), the Tribes' rights to hunt, fish, trap and gather, free of state and federal regulation, survived "termination." The Tribes currently exercise these rights within the former reservation boundary. In addition, there are locations outside of the 1954 Treaty Boundary within the Tribes' area of concern where tribal members continue to gather traditional plants, roots, berries, etc., and where other cultural, religious, and spiritual activities are practiced.

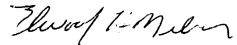
Because of potential impacts to fish, wildlife, and their habitats, plants and other resources pertinent to the exercise of treaty rights, it is imperative that the Tribes be consulted during consideration and planning of site-specific vegetation management projects within and adjacent to the former reservation boundary area. It is important to note that because of the migratory nature of fish and wildlife species relied upon by the Tribes, management concerns often extend beyond the former reservation boundary. Because of potential impacts to cultural resources, and cultural, religious, hunting, fishing, gathering and other Treaty uses, the Klamath Tribes request to be informed of all site-specific projects that will be considered or planned within The Klamath Tribes' Area of Cultural Influence. Where appropriate, the Tribes may wish to participate in development of site-specific mitigation measures to ensure protection of cultural resources and cultural/religious uses and values important to the Tribes.

Contact with the Klamath Tribes should occur early in the scoping or planning phase for site specific projects. It will be helpful to send copies of scoping letters or other notification of intent for site-specific projects (one copy or set of copies each) to the Klamath Tribal Chairman, Natural Resource Department Director, and to the Culture and Heritage Department Director.

Due to staff illness and absence during the holiday season, the Klamath Tribes' Natural Resource Department was not able to document the Tribes' comments as agreed in your previous communication with Don Gentry, the Klamath Tribes' Natural Resource Specialist. I apologize for any inconvenience this may cause. Don informed me, however, that the substance of these comments was communicated in earlier communication with you, and that this letter is a follow-up to that communication.

Thank you for the opportunity to comment on the Draft EIS. If you have questions, need additional information or clarification, or wish to discuss this issue further, please feel free to contact Don Gentry here at the Klamath Tribes Natural Resource Department.

Sincerely,



Elwood Miller, Jr.
Natural Resource Department Director

C: Allen Foreman, Klamath Tribal Chairman
Dino Herrera, Culture and Heritage Department Director

Enclosures: 5

5 Enclosures:

The History of Klamath Treaty Hunting, Fishing, and Gathering Rights brochure

The Klamath Tribe, Welcome Everyone pamphlet

The Klamath and Modoc Tribes and The Yohooskin Band of Snake Indians Under the treaty of 10/14/1864 map

Small Washington, Oregon, California, Nevada and Idaho colored map

Large Washington, Oregon, California, Nevada and Idaho colored map